Archaeological Work Plan
106 Coming Street

Project 205 New Construction

Charleston, Charleston County, South Carolina

May 26, 2026 | Terracon Project No. EN25P081

DES-BCM Reference No. HQE-MAZM-OBJ2E

SCDAH SHPO Project No. 25-JS0212

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Terracon

Nationwide

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Facilities

Environmental

Geotechnical

Materials

EXECUTIVE SUMMARY

The College of Charleston is proposing construction of a student housing residence hall. The parcel includes a portion of what was laid out as the second official municipal cemetery for the City of Charleston in 1794. Given the potential for archaeological remains as well as human burials, the following Archaeology Work Plan has been prepared by Terracon for submittal 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. The project requires a National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit and a CZC Certification. The Clean Water Act (CWA) created the NPDES program, and the U.S. Environmental Protection Agency (EPA) has delegated the authority of issuing NPDES permits to the states. As such, the states are empowered to administer their own permitting program, as long as it complies with the requirements of the NPDES permit. Thus, State-issued NPDES permits are not considered a federal undertaking. In South Carolina, DES issues and manages NPDES permits. The BCM issues the CZC certificates as part of the permitting process for ground disturbance in the coastal zone areas of South Carolina.

The College is an institution of higher education of the State, authorized by the Higher Education Act to issue higher education facilities revenue bonds for the purpose of financing or refinancing in whole or in part the cost of acquisition, construction, reconstruction, renovation and improvement of land, buildings, and other improvements to real property constituting Higher Education Facilities under the General Bond Resolution and the Higher Education Act. No federal funding is anticipated as part of this project and the College's land holdings are state-controlled.

Terracon understands that the College of Charleston has reviewed alternatives to construction at 106 Coming Street. In the event that the current project development proceeds as planned, the following archaeological work plan provides overarching archaeological procedures for documenting cultural features, procedures for the discovery of human remains, protocol for unanticipated discoveries, artifact and cultural material analyses, significance evaluation, curation, and reporting. A discussion of these overarching protocols is followed by an outline of the stages of archaeological work, as currently proposed.



Approximate Project Area Outlined in Red

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ACRONYMS

Acronym	Meaning
ACHP	Advisory Council on Historic Preservation
BCM	Bureau of Coastal Management
CEC	Community Engagement Council
CFR	Code of Federal Regulations
CWA	Clean Water Act
CZC	Coastal Zone Consistency
DES-BCM	Department of Environmental Services-Bureau of Coastal Management
EMI	Electromagnetic Induction
EPA	Environmental Protection Agency
ESP	Early Site Package (SWPPP & Erosion Control Plans)
GIS	Geographic Information System
GNSS	Global Navigation Satellite System
GPR	Ground Penetrating Radar
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
QGIS	Quantum GIS
RPA	Registered Professional Archaeologist
RTK GNSS	Real-Time Kinematic Global Navigation Satellite System
SCDAH	South Carolina Department of Archives and History
SCIAA	South Carolina Institute of Archaeology and Anthropology
SHPO	State Historic Preservation Office
SWPPP	Stormwater Pollution Prevention Plan
USDA	US Department of Agriculture
UTM	Universal Transverse Mercator
UTV	Utility Task Vehicle
XRF	X-Ray Fluorescence

PROJECT BACKGROUND AND OVERVIEW

This Archaeology Work Plan has been prepared by Terracon for submittal 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. The project requires a National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit and a CZC Certification. The Clean Water Act (CWA) created the NPDES program, and the U.S. Environmental Protection Agency (EPA) has delegated the authority of issuing NPDES permits to the states. As such, the states are empowered to administer their own permitting program, as long as it complies with the requirements of the NPDES permit. Thus, State-issued NPDES permits are not considered a federal undertaking. In South Carolina, DES issues and manages NPDES permits. The BCM issues the CZC certificates as part of the permitting process for ground disturbance in the coastal zone areas of South Carolina.

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Terracon understands that the College of Charleston has reviewed alternatives to construction at 106 Coming Street (Appendix A). Furthermore, Terracon acknowledges that the local governing body, pursuant to SC Code 27-43-10 through 27-43-40, may not ultimately consent to the removal of the Second Official Municipal Cemetery, or that the College of Charleston may decide to not develop the 205 Coming Street site. In the event that the current project development proceeds as planned, the following archaeological work plan provides overarching archaeological procedures for:

1) Documenting Archaeological Features;
2) Procedures for the Recovery of Human Remains;
3) Protocol for Unanticipated Discoveries;
4) Analyses, Significance Evaluation, Curation, and Reporting.

A discussion of these overarching protocols is followed by an outline of the stages of archaeological work, including the excavation of human remains (if present), as currently proposed, in the Procedural Summary Matrix and Legend. This document includes detailed work plans, including the processes and excavation plans for the documentation and relocation of the cemetery (*Cemetery Archaeology*, below); as well as the methods and processes for the general archaeological field investigation, laboratory analyses, and reporting associated with the proposed project.

Terracon will submit a standalone research design to the SHPO for review and approval prior to the initiation of subsurface archaeological excavations. This research design will include the approved methodological approaches summarized in this work plan, present explicit research questions, and include a review of relevant gray literature and academic literature. This research design will help establish the context of archaeological materials and/or human remains, if present, as well as define the criteria for National Register of Historic Places (NRHP) eligibility for the site within that context.

The project parcel includes a portion of the second official municipal cemetery for the City of Charleston. Beginning in 1794, the Charleston City Council passed a resolution officially opening the cemetery for burials. The cemetery occupied nearly the entire western half of the city block bounded by Calhoun, Coming, Vanderhorst, and St. Philip Streets. A few years following the closure of the cemetery in 1807, the city divided and sold the cemetery parcel for residential development. From documentary evidence it appears these lots were built upon quickly as the cemetery disappeared from maps and plats in the early nineteenth century.

Although no archaeological site has been previously documented within the proposed project area and the level of disturbance there is currently unknown, it is possible that intact portions of the cemetery, if they exist, could be considered eligible for the NRHP under Criterion D for exhibiting the potential to yield important information associated with the largely undocumented enslaved and disenfranchised population of Charleston at the turn of the nineteenth century. Furthermore, if intact structural remains are encountered in situ or cultural features associated with the historical occupations of the site are documented, it is possible they could be considered eligible for the NRHP under Criterion D for exhibiting the potential to yield important historical information regarding the growth and development of Charleston.

PROPOSED FIELD METHODOLOGY OVERVIEW

Archaeological investigations discussed in the following work plan include strategies for identification, documentation, excavation, and analysis of cultural resources. The following methodology overview acknowledges that changes to the proposed project methodology are anticipated due to the complex nature of the site due to multiple components and the potential for human remains. The proposed stages of this archaeological work plan provide for work stoppages, additional SHPO consultation, and plan revisions to be adopted as Amendments (in consultation with SHPO and other stakeholders).

Amendments to the approved work plan may arise through the established information-sharing and feedback loop. Proposed amendments will be informed by ongoing project development, the results of the archaeological investigations, and engagement with the community and the Community Engagement Council (CEC), including recommendations generated through consultation activities. As the consulting agency, all formal requests for amendments to work plans, as well as their ratification, will be submitted to the South Carolina SHPO for review. SHPO may elect to accept, deny, or provide comments requiring revision or further consideration. The College of Charleston acknowledges that this formal ratification process may evolve over the course of the project as development progresses, additional information becomes available, or consultation needs expand.

Field methods for this project may include geophysical surveys, archaeological monitoring, unit excavations, feature documentation, and disinterment of human remains (if present).

Geophysical Surveys

Terracon proposes conducting geophysical surveys of unobstructed areas within the project area. This will consist of ground penetrating radar (GPR) and electromagnetic induction (EMI) surveys. The use of a second geophysical instrument (EMI) increases our ability to confidently interpret results, which can be helpful in identifying historical cemetery sites. Following the completion of the geophysical surveys, a Post-removal Geophysical Survey Report will be provided to SHPO and the South Carolina Department of Environmental Services Bureau of Coastal Management (DES-BCM) for review. This report will describe potential anomalies recorded as a result of the GPR surveys. It is anticipated that the methodologies for subsequent archaeological activities may change as a result of the geophysical survey. The Geophysical Survey Report will discuss the results of the geophysical survey as well as proposed alterations to the Archaeological Work Plan, if warranted.

The College, in accordance with the Community Engagement Council, is moving forward with a pre-disturbance GPR survey. The review, methodology, reporting, and approval of that work is outside the scope of Terracon Consulting, Inc and will be submitted directly by the College. Results may be used to inform project methodology once approved by SHPO and provided to Terracon.

Geophysical Field Exploration Methods

Terracon will conduct the second geophysical survey using GPR and EMI to survey the project area. Prior to the geophysical survey, during Stage 2a, an arbitrary grid will be established in a Geographic Information System (GIS) and will consist of 30-x-30-m blocks. The survey transects will be conducted approximately north to south to maximize the potential for crossing unmarked graves, which are typically oriented approximately east to west. The EMI survey will utilize a CMD-MiniExplorer 6L electromagnetic conductivity meter, or similar. Data will also be collected in 30-x-30-m blocks, or similar, along the same axis as the GPR survey. EMI data will be collected in 25 cm transect spacing to ensure the data is sufficiently dense. EMI data will be processed in Terrasurveyor64, or similar.

An Emlid Reach RS2+ real-time kinematic global navigation satellite system (RTK GNSS system) with a horizontal accuracy of 0.7 cm and a vertical accuracy of 1.4 cm will establish the geophysical survey grid and permanent datums at each survey location.

Once the GPR survey is completed and the data has been processed, Terracon will provide the SHPO with GPR amplitude depth slices for independent review. Terracon will not proceed with additional fieldwork until the SHPO is given the opportunity to review geophysical data and anomalies/potential burials. The College will update the public on findings throughout the work performed through the project website at https://coming-street-commons.charleston.edu/, in accordance with SHPO request dated September 5, 2025. It should be noted that information concerning locational data of human remains will remain redacted until the completion of the project and sensitive information (such as photographs of skeletal remains) will not be made publicly available.

Archaeological Monitoring

Terracon will notify SHPO 24 hours prior to archaeological monitoring fieldwork to inform them of the work so they can provide informed, professional responses to any inquiries or concerns from the public their office may receive. Given the potential for encountering cultural features, including human skeletal remains, archaeological monitors will be present during all ground disturbance work including Storm Water Pollution Protection Plan (SWPPP) infrastructure requirements and demolition work (including the removal of asphalt pavement from the site), or any other subsurface disturbances. If mechanical excavators are on site, Terracon proposes that monitors work in pairs, assigning two monitors—including at least one human skeletal analyst—to each excavator. If multiple excavators are operating, each machine will be supported by its own dedicated two-person monitoring team. Prior to initiating any work on site, contractors will be educated on site processes and what to look out for. In addition to creating a pamphlet with bullet points (Appendix B), Terracon will brief any contractors working on site about the legal ramifications for desecrating a burial, process for reporting human or cultural remains, and what to look out for.

If intact archaeological deposits are encountered during monitoring, the monitors will instruct the mechanical excavator to stop work and/or relocate no fewer than 25 meters away while the feature is documented. If cultural features are encountered during this work, they will be

preliminarily documented (photographed, sketch map, notes, and securing the feature from additional impacts) but not excavated. If potentially significant cultural features (such as intact structure foundations, privies, or other larger features) are uncovered during the geophysical enabling demolition efforts, temporary avoidance of these areas by ground-disturbing activities may be necessary pending additional SHPO coordination and/or a site visit. The area surrounding the cultural feature would be secured and marked as an avoidance area with surveyor's flagging tape and ground stakes. It is expected that geophysical enabling demolition work would progress elsewhere on the site and that such avoidance would not cause significant project delays. Terracon would consult with SHPO prior to the excavation of features encountered during monitoring.

Archaeological monitors will be given sufficient time to inspect exposed areas and/or record cultural materials and/or features. "Sufficient time" is variable based on feature type, size, and complexity. An archaeological monitor can generally conduct preliminary documentation activities (photography, sketch plan, notes, and securing the feature from additional impacts) within an hour; however, if additional time is required work can continue in another portion of the site, under the supervision of a monitor, while the feature is documented to archaeological standards. Terracon will provide the SHPO with a detailed description of the features and sufficient supporting documentation to aid SHPO in rendering an NRHP eligibility determination. Terracon will send weekly archaeological monitoring technical memorandums to SHPO to keep them apprised of site conditions and results of work.

The intent of archaeological monitoring is to identify and assess intact, subsurface cultural features and artifact concentrations as well as potential burials or human remains. With the exception of a representative sample of temporally or culturally diagnostic artifacts (which may be collected, as warranted, from disturbed fill or exposed ground surface), no systematic collection of unprovenienced artifacts or cultural materials from previously disturbed deposits or construction fill would occur. Similarly, analysis would be limited to artifacts and cultural materials recovered from intact feature contexts, discussed below.

Furthermore, if human remains are encountered during archaeological monitoring the Charleston County Coroner will be called to analyze the remains. If they are determined historical, they will be left on site, reburied in place, georeferenced using GPS, and documented in field notes. Human remains will not be removed from the site unless the local governing body, the City of Charleston, approves the removal, and SHPO has had an opportunity to review and approve Terracon's project Research Design document.

Site Security

Establishing site security and privacy is a top priority and will be implemented during Stage 2A. The project area should be enclosed with a fence that is 6–8 feet high, durable, and equipped with privacy screening. Privacy screening serves two critical purposes:

- It prevents public exposure to human remains during excavation and removal, ensuring dignity for the deceased.

- It helps deter looters or vandals who might attempt to identify areas of interest by observing fieldwork.

A lockable gate should be included to secure the site when crews are not present. In accordance with SC Code 16-11-600, *Notice of trespassing*, "No Trespassing" signs will be properly posted in at least four (4) conspicuous locations around the site, including corners and all primary entry/exit points. Under 16-11-600, entering the property after a "No Trespassing" notice has been posted or personally communicated is a misdemeanor, punishable by up to a $100 fine and/or up to 30 days' imprisonment. The statute further provides that evidence of proper posting constitutes conclusive notice for purposes of enforcing trespass violations.
Because proof of posting is treated as conclusive notice, a simple posting log should be maintained that documents the following:

- Date/time posted
- Locations (sketch map)
- Method of installation
- Photos of each sign from the approach direction
- Name(s) of personnel who installed the sign
- Witness name/signature
- Maintenance checks and log (inspection dates, condition noted, and actions taken if damaged/missing)

Furthermore, SC Code 16-11-780 prohibits individuals from intentionally entering properly posted private or state lands to disturb, excavate, or remove archaeological resources, defined as artifacts or human-related material remains at least 100 years old that possess scientific or commercial value. Violations carry escalating penalties from misdemeanor to felony, with fines of $1,000–$5,000 and up to five years' imprisonment. This law also allows for seizure and forfeiture of equipment used in felony violations and authorizes civil recovery of damages by the landowner or the State.

During excavation of burials or mortuary features, shade tents or larger event tents should be used to provide additional privacy, particularly from aerial observation. Security cameras have been installed on site and will be monitored by 24-hour surveillance. The site fencing and security plan will be provided to SHPO for review in compliance with City of Charleston Technical Review Board (TRC) approved permit site plan.

Unit Excavation

Following the completion of geophysical field surveys, the results of the geophysical surveys will be reviewed by SHPO and Terracon to determine the portions of the site to be investigated with exploratory trenches (see Stage 4A, below). Pending the results of these surveys and in consultation with SHPO, Terracon may use one or more 1-x-5-meter trenches to investigate the location of potential burials and other areas specified in Stage 4A of the work plan.

Following completion of trench excavations and review by SHPO, general unit excavation will proceed with the systematic excavation of 1-x-1-meter units within 5-x-5-meter grid blocks. Each block will be comprised of twenty-five 1-x-1-meter units which would be identified by the northing and easting of the southwest unit corner. Units would be excavated in arbitrary 10-cm levels within natural strata (clearly redeposited or modern fill would be excavated as a single stratum rather than by arbitrary 10-cm levels). Excavation will continue until the soil profile indicates a reasonable depth below disturbed subsoil and two culturally sterile, natural soil levels are encountered.

If non-burial cultural features (such as structural remains, privies, wells, or trash pits) are noted, these features would be excavated according to the Documenting Archaeological Features procedures outlined below. Human burials or likely human burials would be documented in accordance with procedures outlined in the embedded *Cemetery Archaeology* plan below.

Excavated soil from the excavation units would be screened through a 1/4-inch mesh screen for standardized recovery of cultural material. Field notes will be recorded on standardized test unit and block unit forms and will include unit/block designators, depth, general conditions, amount of cultural material recovered and brief descriptions of the material, and other pertinent information such as presence of and relationships between features. A Munsell chart will be used to record soil colors, and US Department of Agriculture (USDA) soil texture classifications will be used to characterize soil textures. If cultural material is encountered it will be placed into 4-mil plastic bags that will be labeled, written in black permanent marker, with pertinent project information including: field specimen (F.S.) number, project number, project name, block number, unit number, level, stratum, depth, crew initials, date, and number of bags associated with that F.S. number. Once a unit is completed, associated field forms would be reviewed for consistency, readability, and errors, and then turned into the field office/lab with all cultural material recovered from that unit. Unit paperwork and artifact bags will be reviewed by the onsite field director for accuracy and consistency, and any errors or issues will be addressed immediately to ensure quality data recording.

Documenting Archaeological Features

Since the closure of the cemetery, the area has undergone several cycles of construction and demolition. Historical records also indicate that multiple structures have been built and later removed from within the proposed project boundaries. As such, it is anticipated that historical architectural remains and features may be encountered during the investigations. These remains may be evident as foundations, piers, privy pits, and/or other non-structural features, such as middens or refuse pits. If cultural features or in situ architectural or structural remains that are not associated with modern or historical dumping episodes are encountered during fieldwork, the remains will be assigned a feature number, exposed, and documented with standardized field notes, measurements, mapping, and photography. Following initial documentation, SHPO would be contacted and provided with a detailed description of the feature(s) and sufficient supporting written and photographic documentation to aid them in consulting with Terracon on the appropriate excavation or sampling strategies, as warranted.

Procedures for the documentation and excavation of potential burial features are presented in the *Cemetery Archaeology* section, below.

Terracon plans to begin block excavations at the locations of documented former structures, areas exhibiting the presence of potential structural remains, and other obvious non-mortuary cultural features identified during the geophysical surveys and subsequent trench excavations. Cultural features would be excavated by methods appropriate to their size and type and in consultation with SHPO, if warranted. In general, feature locations will be referenced to the general site plan and written descriptions of features will include dimensions, shape, soil matrix color and texture, depth below surface, stratigraphy, and recovered materials. Cultural features will initially be exposed in plan view, then drawn to scale, photographed, and recorded on standardized unit and block forms. Once documented in plan view, the feature will be bisected to record the profile in cross-section then drawn to scale, photographed, and recorded on standardized unit forms.

The depth and type of fill material used, as well as the stability of the fill, would dictate the extent/depth of the feature excavation. For example, smaller features such as post holes would be bisected, half of the fill removed, and one profile recorded. Pit features (refuse pits) may be similarly bisected and excavated, if warranted. Large or deep features (e.g., wells, privies) will be sampled or bisected, dependent upon the stability and depth of the fill. Once the cross-section profile is completely exposed, it would then be drawn to scale, photographed, and recorded on standardized unit forms. Once the profile documentation is complete, the remaining feature fill will be screened for cultural material. Builder's trenches may be investigated with smaller test unit excavations or similar methods, as appropriate. For example, a 1-x-1-m test unit may be excavated along one side of intact structural remains to document the builder's trench and determine if there are diagnostic artifacts located within the historical backfill. Architectural features (e.g., piers, foundation remnants) may be fully exposed and documented with measured drawings and photographs.

If potential burial features or human remains are encountered within a non-burial feature or structural remains that appear to have intruded upon a burial, the documentation and excavation of the burial will be given preference over the documentation of the historic period features. Specific methodology for burial or grave excavations are presented in the *Cemetery Archaeology* section, below.

ARCHAEOLOGICAL ANALYSES, NRHP EVALUATION, CURATION, AND REPORTING

Archaeological Analyses

With the exception of potential human remains and associated burial artifacts (including coffin hardware, nails, or other associated mortuary furniture), cultural material will be stored with chain of custody forms at Terracon's Charleston office in a dedicated, secure, temperature-controlled room until they are turned over to SCIAA. This Terracon office space will serve as the archaeology laboratory and storage space throughout the duration of the proposed project. Artifacts will be processed in compliance with 36 CFR 79 and SCIAA's curation guidelines[1]. Specific procedures for the recovery and handling of human remains and associated cultural materials are presented in the *Cemetery Archaeology* section below.

Incoming materials to the archaeology laboratory will be checked against the field specimen log to confirm that each bag is correctly labeled with pertinent information including site number, block number, provenience, stratum, depth, crew initials, and field date. Following initial cataloging, artifacts will be:

- Washed or brushed free of soil.
- Sorted by block number, unit number, raw material class.
- Labeled by provenience.
- Dried, counted, weighed, analyzed, and placed in 4-mil polyethylene, zipper-seal archive-quality bags.

Artifact analysis seeks to determine the function (if unknown) and temporal range of archaeological sites. During artifact analysis, comparative literature will be consulted using Terracon's in-house library and additional resources and reference materials as warranted.

In accordance with the *South Carolina Standards and Guidelines for Archaeological Investigations,* updated 2024, analysis will follow established classifications and accepted regional typologies. Basic artifact analysis will include the following tasks:

- Assign an accession, or artifact identification, number.
- Document material type.
- Document class (e.g., projectile point, lithic flake, bead, etc.).
- Record weight and count.
- Record dimensions, if appropriate.
- Document diagnostic type, if known (e.g., Creamware, Clovis, etc.).
- Record other noteworthy attributes.

No specialized analyses (e.g., faunal analysis, ethnobotanical analysis, radiocarbon dating, DNA-testing, etc.) or artifact conservation are anticipated as part of this project; however, if such materials are recovered from an intact feature context, recommendations for future

[1] South Carolina Institute of Archaeology and Anthropology. 2005. *Curation, Loan, and Access Policy*. https://sc.edu/study/colleges_schools/artsandsciences/sc_institute_archeology_and_anthropology/documents/curation_loan_access_policy.pdf

analyses would be provided in the report. Collection of representative samples for specialized analyses (e.g., radiocarbon, ethnobotanical, and/or dendrochronological) are discussed in *Stage 4B*, below.

With the exception of a representative sample of temporally or culturally diagnostic artifacts (which may be collected, as warranted, from the disturbed fill or exposed ground surface), artifact analysis and curation would be limited to artifacts and cultural materials recovered from intact subsurface feature contexts. SHPO has requested that Terracon retain a minimum 5 percent representative sample of any loose bricks or brick fragments associated with intact architectural features (not associated with dumping or filling episodes) for potential future X-ray fluorescence (XRF) analysis. This sample will be curated with SCIAA following the completion of the project. All potential grave-related personal artifacts and other associated materials (coffin hardware, nails, etc.) will be collected, stored, and reinterred with the associated human remains by the certified funeral director.

Public feedback indicates that some individuals have expressed interest in conducting DNA testing on recovered human remains. This process is inherently destructive, as it requires the removal of samples of bone or teeth to extract genetic material. While some community members may value the scientific and cultural insights such testing could provide, others may regard it as desecration and strongly oppose such analysis. The CEC should determine whether DNA testing is warranted; however, this specialized analysis is not included as part of the current work plan. The College's commitment with the CEC will help direct the extent of this sensitive analysis with agreed upon review and updates to SHPO. Appendix C contains more information about the CEC.

NRHP Evaluation

The National Register of Historic Places (NRHP) is an official register listing historically significant sites and properties across the United States. The NRHP is maintained by the National Park Service; at the state level the NRHP is administered by the SHPO. As a consultant, Terracon does not determine whether a resource is eligible for the NRHP. Terracon consults with SHPO and offers NRHP recommendations for resources, but it is the SHPO who issues the determination on whether a resource is eligible for the NRHP. Due to the complexity of the proposed project, Terracon will maintain communication with SHPO to discuss findings and consult on next steps and expectations in accordance with the Procedural Summary Matrix in Appendix D. Outlined below are the general criteria evaluating a resource's eligibility for listing in the NRHP.

Archaeological significance of sites is determined using criteria defined in 36 CFR 60.4[2], in coordination with the SHPO. Guidance for applying the NRHP criteria is found in National Park Service (NPS) Bulletin 15: *How to Apply the NRHP Criteria for Evaluation*[3]. Site significance,

[2] Code of Federal Regulations Part 60–National Register of Historic Places. § 60.4 Criteria for Evaluation. https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol1/pdf/CFR-2012-title36-vol1-sec60-4.pdf
[3] National Park Service, U.S. Department of the Interior. 1997. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf

as established by 36 CFR 60.4, may be in history, architecture, archaeology, engineering, or culture. Historic properties include buildings, structures, objects, sites, and districts. To be considered eligible for listing in the NRHP a historic property must exhibit integrity and meet one of the following criteria (36 CFR 60.4):

A. Be associated with events that have made a significant contribution to the broad patterns of our history, or
B. Be associated with the lives of persons significant in our past, or
C. Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values or that represent a significant and distinguishable entity whose components may lack individual distinction, or
D. Have yielded or may be likely to yield, information important in prehistory or history.

While most archaeological sites are recommended as eligible for the NRHP under *Criterion D*, this criterion is somewhat vague. In order to clarify the issue of site importance, the following attribute evaluations add a measure of specificity that can be used in assessing site significance and NRHP eligibility:

- *Site Integrity* – Does the site contain intact cultural deposits or is it disturbed?;
- *Preservation* – Does the site contain material suited to in-depth analysis and/or absolute dating such as preserved features, botanical and/or faunal remains, or human skeletal remains?;
- *Uniqueness* – Is the information contained in the site redundant in comparison to that available from similar sites, or do the remains provide a unique or insightful perspective on research concerns of regional importance?;
- *Relevance to Current and Future Research* – Would additional work at this site contribute to our knowledge of the past? Would preservation of the site protect valuable information for future studies? While this category is partly a summary of the above considerations, it also recognizes that a site may provide valuable information regardless of its integrity, preservation, or unique qualities.

It should be noted that cemeteries are not typically considered eligible for inclusion in the NRHP unless they also meet certain criteria considerations[4]. While a cemetery may qualify for listing under Criterion A (association with significant events), Criterion B (association with significant persons), or Criterion C (design), the cemetery must also meet one of the special Criteria Considerations, including deriving its primary significance from architectural/artistic distinction or historical importance (or representing the only surviving structure associated with a person or event).

[4] Potter, Elizabeth Walton, and Beth M. Boland. 1992. *Guidelines for Evaluating and Registering Cemeteries and Burial Places*. National Register Bulletin 41.

Reporting

Following completion of archaeological excavation and analyses, the Data Recovery Report will be prepared detailing the results of the archaeological investigation. The technical report will adhere to the requirements of the *South Carolina Standards and Guidelines for Archaeological Investigations*[5] and will contain the following components, summarized in Table 1.

Table 1. Report Format and Minimum Content requested by SHPO (2024).

Chapter	Content
Title Page	Lists the report title with investigation type and project location. Additionally, the client's information, Authors, Principal Investigator's data and signature, report status (draft/revised draft/final), and report date.
Abstract	Describes the project, project purpose, summarizes the report findings, summarizes resource NRHP evaluations, and summarizes management recommendations.
Table of Contents	Outlines the report chapters including page numbers.
List of Figures/Tables	Detailed lists outlining the figures and tables used in the report.
Project Introduction	Summarizes the purpose of the report/fieldwork, the client, the reason the undertaking is being conducted, summarizes legislation that governs the work, lists project personnel, lists the range of work dates, and includes locational maps.
Environmental Setting	Summarizes the general environmental characteristics including physiographic information, proximal water sources, soil characteristics and current land use.
Cultural Context	Provides an overview of the local cultural history associated with the site and the events that may have shaped the community.
Summary of Previous Archaeological Investigations	Summarizes available and known data regarding previous archaeological work that may have been conducted onsite.
Research Design	Provides explicit statements and poses questions that may be answered with archaeological work.
Methodology	Outlines the field and lab methodology.
Results	The results will summarize the work conducted and include feature descriptions, cultural associations, background research, brief narrative, site map, representative site photos, soil descriptions, and site significance recommendations or whether additional work is required to determine a site significance recommendation. No photographs of human remains will be included in the technical report, rather, they will be referenced and included as an appendix to avoid dissemination of sensitive media.

[5] South Carolina Department of Archives and History, State Historic Preservation Office, South Carolina Institute of Archaeology and Anthropology, and the Council of South Carolina Professional Archaeologists. 2000 (Updated 2024). *South Carolina Standards and Guidelines for Archaeological Investigations.* https://scdah.sc.gov/sites/scdah/files/Documents/Historic%20Preservation%20(SHPO)/Programs/Programs/Review%20and%20Compliance/Standards_Guidelines_2024.pdf

Chapter	Content
Summary and Recommendations	Summarize the project, list and review cultural resource data, and make recommendations for NRHP eligibility and whether additional work is recommended.
References Cited	Detailed list of references used during investigation.
Appendices and Attachments	Appendices will include the Archaeological Monitoring Report(s), SHPO concurrence letter (once obtained), artifact catalog, specialist reports or lab results, and photographic documentation of human remains. Photographs of human remains are treated as classified and not intended for public consumption; this appendix will be removed on any public-facing version of the report.

Terracon will provide hard copies and a digital PDF of the technical report to SHPO and SCIAA. The entire project site will be recorded under a single site trinomial (to be determined). The Terracon Project Manager and SHPO will be evaluating the eligibility of this site against NRHP criteria throughout the lifecycle of the archaeological investigation and as features are encountered. SHPO reserves the right to present any reported findings for peer review. Peer review is generally conducted by people who have demonstrated expertise pertaining to the reporting subject matter.

Following acceptance of the final report by SHPO, and in consultation and collaboration with stakeholders, the results of the investigations may be presented in a public information component, such as an online ArcGIS StoryMap, public presentation, or other published documentation, as appropriate. Copies of the final documentation will be housed at the College of Charleston Libraries Avery Research Center for African American History and Culture (See Appendix E for the College of Charleston Commitment Letter).

Curation

Cultural material (excluding human remains or associated grave items) recovered during the archaeological investigation will be curated in accordance with SCIAA's Curation, Loan, and Access Policy[6] document published in 2005 and with the standards established in 36 CFR Part 79. Prior to curation, recovered cultural material will be assigned accession numbers, re-bagged in clean 4-mil bags, labeled, sorted by provenience and placed in larger nesting bags, and nesting bags will be sorted by block, unit, and level and stored in archival banker boxes in Terracon's secure, climate-controlled laboratory in Charleston.

Once Terracon receives concurrence from SHPO indicating the Data Recovery Report and project recommendations are approved, all recovered cultural material (excluding human remains or associated grave items) will be packaged and delivered with chain of custody forms, a final copy of the Data Recovery Report, and completed site form to SCIAA for curation in perpetuity.

[6] South Carolina Institute of Archaeology and Anthropology. 2005. *Curation, Loan, and Access Policy*. *https://sc.edu/study/colleges_schools/artsandsciences/sc_institute_archeology_and_anthropology/documents/curation_loan_access_policy.pdf*

CEMETERY ARCHAEOLOGY

This section outlines the methods and processes for the archaeological recovery of human remains and burial-related cultural materials related to the use of the site as a cemetery in the late eighteenth to early nineteenth centuries. Under South Carolina (SC) Code 27-43-10, *Removal of Abandoned Cemeteries*, an abandoned cemetery or burial ground may be removed and relocated to a suitable location if the governing body of the county or municipality in which the cemetery is located determines "it necessary and expedient" to remove the graves and 30 days' notice must be given to known relatives or, if there are no known relatives, 30 days' notice of removal must be published in a local newspaper with general circulation. Terracon understands that the College of Charleston has reviewed alternatives to construction at 106 Coming Street (see Appendix A).

In the event that the current project development proceeds as planned and human remains are identified during the archaeological fieldwork, the following section provides overarching procedures and details for work related to the cemetery including: 1) Public Notice and Public Consultation, 2) Methodology for Excavating and Documenting Mortuary Features, and 3) Analyses and Reporting. This document was produced as part of the overall Archaeological Work Plan for SHPO review and approval prior to the initiation of any field investigations.

This section of the work plan outlines the methods and processes for excavation, documentation, and handling of human remains. As part of this project, Terracon will submit an overarching research design to the SHPO for the archaeological investigations for review and approval prior to the initiation of subsurface archaeological excavations, including burial features. This research design will include approved methodological approaches detailed in this work plan, present explicit research questions, and include a review of relevant gray literature and academic literature. This research design will help establish the context of the site, as well as define the criteria for National Register of Historic Places (NRHP) eligibility for the site within that context. Although the site has not been previously documented within the proposed project area and the level of disturbance there is currently unknown, it is possible that intact portions of the cemetery field, if they exist, could be considered eligible for NRHP under Criterion D for exhibiting the potential to yield important information associated with the largely undocumented enslaved and disenfranchised population of Charleston at the turn of the nineteenth century.

Between 1794–1807, a portion of the proposed project area was established by the City of Charleston to be used as a public cemetery that was used for the burial of indigent white persons, strangers (foreigners), free people of color, and the enslaved residents of Charleston. Within a few years of discontinuing operations as a cemetery, development began within the proposed project area as multiple structures were constructed. Over the next two centuries, the site was impacted by the construction and demolition of multiple structures within the proposed project boundaries. As a result of these impacts the subsurface has been impacted down to unknown depths. Given the history of ground disturbance and multiple historical construction episodes within the project area, there is the potential for encountering displaced or disarticulated human skeletal remains.

In 2023, the Advisory Council on Historic Preservation (ACHP) developed a policy statement to establish a minimum set of rules and principles to be implemented to provide consideration and protection to burial sites, human remains, and funerary objects[7]. The policy statement stresses the need for coordination and consultation with communities that will be affected by development projects, particularly historically marginalized groups such the descendants of Africans and Indigenous people. Consultation should seek consensus with potential descendant communities regarding decision making (including what constitutes respectful treatment of human remains and burial sites), deferring to their preferences when feasible. Although the ACHP and SHPO prefer that burial sites be avoided and protected, if no suitable alternatives are selected/available, consultation with the descendant community is urged prior to ground disturbance, and extreme care and respect is expected when handling human remains and/or funerary objects. See Appendix F for the College of Charleston's developing policy outline on the ACHP Policy Statement.

Public Notice and Public Consultation

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

As a transition to a more direct community and descendent-led engagement, a Community Engagement Council (CEC), comprised of local volunteers, descendant community members, and other interested stakeholders, has been created to provide input on the proposed project. The CEC was created to provide advice on the respectful handling of human remains, selection of certified funeral director(s), selection of reinterment location, memorialization of the people and site, and to advise whether additional analysis, such as DNA testing or Isotope analysis, is warranted. Information about the CEC, including a roster and draft general mission statement prior to committee adoption can be found in Appendix C

Since the state does not have codified protocols for the excavation and documentation of historical human burials, the methodology described in this work plan is written in general accordance with the *South Carolina Standards and Guidelines for Archaeological Investigations*[8]. With direct guidance from the CEC, methodology for respectful and ethical treatment, selection of a funeral director, reinterment location, or memorialization will develop with the project. The methodology described below reflects best practices as outlined by the

[7] ACHP. 2023. *Policy Statement on Burial Sites, Human Remains, and Funerary Objects*. https://www.achp.gov/sites/default/files/policies/2023-07/PolicyStatementonBurialSitesHumanRemainsandFuneraryObjects30June2023.pdf

[8] South Carolina Department of Archives and History, State Historic Preservation Office, South Carolina Institute of Archaeology and Anthropology, and the Council of South Carolina Professional Archaeologists. 2000 (Updated 2024). *South Carolina Standards and Guidelines for Archaeological Investigations.* https://scdah.sc.gov/sites/scdah/files/Documents/Historic%20Preservation%20(SHPO)/Programs/Programs/Review%20and%20Compliance/Standards_Guidelines_2024.pdf

state's guidelines for archaeological investigation, since there are no federal or state archaeological guidelines or standards guiding the relocation and documentation of human remains. It is anticipated that some aspects of the methodology below will be revised following input and feedback from the CEC. Refer to Appendix G for implementation of information sharing and feedback loop to help inform the project.

Although there is not a federal nexus trigging the Section 106 process, because there is no federal agency involvement, funding, or permitting, there is a possibility of encountering historical Native American burials interred within the boundaries of the cemetery. For engagement concerning Federal Tribes and NAGPRA, see Appendix H.

The College will update the public on findings throughout the work performed through multiple means including:

- Email submission to coming-commons@cofc.edu, as listed on the Project 205 / Coming Street Commons website:
- www.coming-street-commons.charleston.edu/get-involved
- Direct engagement with members of the Community Engagement Council (CEC) or public inquiry submissions at CEC public meetings
- Participation in publicly noticed Community Outreach Forums
- Referenced opportunities identified or defined in the applicable Project Work Plans and Procedural Summary Matrix
- Direct outreach and maintained lines of communication with Federally recognized Tribal Nations, undertaken in good faith and without imposed response deadlines

It should be noted that information concerning locational data of human remains will remain redacted until the completion of the project and sensitive information (such as photographs of skeletal remains) will not be made publicly available.

Public Notice

If the proposed project moves forward at the current location, pursuant to SC Code 27-43-10, the College of Charleston is required to publish a legal notice for four consecutive weeks in a newspaper of general circulation in the county to inform the public of the intent to relocate any human remains and then another four-week period is given for public comment. The public announcement portion of this project is expected to take no less than eight weeks before the proposed initiation of subsurface archaeological field investigations. This announcement should include details such as the project location, including a brief description of the current conditions of the site; a summary of the proposed project; and a means for the public to respond to or comment on the proposed relocation of the human remains.

Procedures for the Discovery of Human Remains

While it is possible that intact human burials associated with the former cemetery may be encountered during the investigations, within a few years of the cemetery's closure, development began, and over the next two centuries, the site was impacted by the construction and demolition of multiple structures within the proposed project boundaries. As

a result of these impacts, there is likely significant subsurface disturbance to the former cemetery. As such, there is a higher potential for encountering displaced or disarticulated human skeletal remains potentially at or just below the ground surface that may be disturbed or exposed during preliminary ground disturbing activities. Given the potential for human remains, archaeological monitors will be onsite during all proposed subsurface disturbances associated with the current project. This includes, but is not limited to, installation of silt fencing, utility removal, and installation of a groundwater/dewatering station. See Appendix I for coordinating SWPPP for site layout.

If human remains (or likely human remains) are encountered by contractors prior to or during geophysical enabling demolition on the proposed project site, ground disturbing work will be stopped within 25 meters of the remains, and the Charleston County Coroner's Office will be contacted at the number provided below to confirm the remains are not modern. Although the Charleston County Coroner is aware of the proposed project, they will be informed of the nature of our work, given a description of the remains, and the project location address. Terracon will then inform the SHPO at the email address below within 24 hours of the unexpected discovery and will provide them with a brief update. If the remains are determined to be historic aged, they will be mapped in place, and then removed, documented, and stored per the protocols outlined in the *Cemetery Archaeology* section of this document.

Contacts for notification of unanticipated human remains discoveries are:

- Charleston County Coroner: (843) 476-4030
- Primary SHPO Contact: Robert Larsen at (803) 896-6181 or rlarsen@scdah.sc.gov
- Secondary SHPO Contact: John Sylvest at (803) 896-6129 or jsylvest@scdah.sc.gov

During the archaeological investigations, if human remains are encountered, either as articulated/intact burials or disarticulated remains, and following SHPO consultation, the location of the remains or burial will be plotted using a total station; the remains recorded in field notes, mapping, and other documentation; and the remains would be respectfully collected, wrapped in muslin, transferred to a fully covered box, and transported to the field office/lab for documentation and temporary storage. For security reasons, no human remains will be left in the field office/lab overnight. Instead, with the consent of the project funeral director, human remains would be transported to the Terracon Charleston office for overnight storage in a locked, climate-controlled room serving as a dedicated laboratory for this project. It is expected that human remains would be turned over to a certified funeral director within 24 hours of being recorded.

Excavation Methodology

The following methodology outlines the process for excavating, documenting, and handling mortuary features, including single graves, mass graves, and co-mingled/scattered human remains. It is important to note that there are no state or federal guidelines governing the

archaeological removal and documentation of human remains, therefore, the methodology presented here represents a synthesis of best practices from various agencies and institutions, including the Institute of Archaeologists of Ireland[9], Institute of Field Archaeologists[10], and Oxford Archaeology[11] and follows the general methodology outlined in the South Carolina Standards and Guidelines for Archaeological Investigations, updated 2024.

In accordance with SC Code 27-43-30, *Supervision of Removal Work*, work associated with the removal of a grave shall be done under the supervision of the state-licensed funeral director. Prior to site excavation the project funeral director is responsible for obtaining a permit from the SC Department of Public Health authorizing the exhumation and transport of human remains. This professional will be procured in combination with CEC guidance and state procurement law. Terracon will not proceed with exhumation or removal of burials, human remains, or grave goods until: 1) SHPO is given the opportunity to review geophysical data and anomalies/potential burials resulting from the proposed Stage 1 and 2 geophysical surveys; 2) this Work Plan and the forthcoming Research Design are reviewed and approved by SHPO; and 3) pursuant to state code 27-43-10, 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. Human remains will not be removed during the geophysical enabling demolition. No construction is expected to take place onsite during the archaeological investigation.

Field Laboratory Requirements

The field laboratory will serve as a secure on-site facility for sensitive electronic equipment and temporary storage of human remains, if recovered. The proposed location for the field office is near the Vanderhorst Street entrance to the project area, subject to confirmation following the geophysical survey and ground-truthing excavations.

To ensure security, the field office would have double locks on all exterior doors, including a deadbolt. Inside the laboratory, a locking cabinet or closet with keyed locks will be provided for the temporary storage of human remains and/or grave goods until they are transferred to a larger secure facility, such as Terracon's dedicated archaeology laboratory in Charleston or a certified funeral director's facility.

With the funeral director's approval, Terracon plans to transport recovered human remains daily to its Charleston office for documentation (e.g., measurements, photography). Storage of human remains will comply with 36 CFR 79, which requires:

- Placement in a locking cabinet or closet with keyed locks inside a locked office
- Fire detection and suppression systems
- Climate control to maintain appropriate temperature and humidity
- Protection against water damage, pests, and other environmental risks

[9] Institute of Archaeologists of Ireland. 2006. *Code of Conduct for the Treatment of Human Remains*. First Edition–May 2006.
[10] Institute of Field Archaeologists. 2004. *Guidelines to the Standards for Recording Human Remains*. IFA Paper No. 7. British Association for Biological Anthropology and Osteoarchaeology.
[11] Oxford Archaeology. Undated. *Policy Document: The Treatment of Human Remains in the Care of Oxford Archaeology*.

Terracon will retain human remains only until they are collected by the project's funeral director. All transfers of cultural materials, including human remains, will be documented using chain-of-custody forms. These forms must be accurately maintained at all times, with the original retained by the Terracon field director and copies submitted alongside curated cultural materials.

While the level of effort may be adjusted based on the results of the geophysical surveys, it is anticipated that the field team will include multiple human skeletal analysts (e.g., bioarchaeologist, forensic archaeologist) working within the project area, supported by a dedicated, experienced human skeletal analyst stationed in the field laboratory. While mortuary features are being exposed, documented, and removed, teams will work under large shade tents or event tents to prevent onlookers from recording or photographing human remains from above. Due to the sensitive nature of this project and out of respect for the deceased, field staff will be strictly prohibited from photographing or recording human remains and from discussing or sharing information about the project on social media. Dedicated site photographers will be selected for documentation purposes only; photographs of human remains will not be included in publications but will be included with the archived materials submitted to SCIAA for curation.

The proposed project area likely exhibits a complex tapestry of subsurface cultural features, including features intersecting other features. Therefore, there can be no timeline or time constraints regarding the excavation and documentation of such a complex web of features. Because it is unlikely this document can address every possible scenario that could potentially be encountered in the proposed project area, it will be imperative to maintain bi-weekly consultation with SHPO to discuss changes to methodology if necessary. Changes will be adopted as Amendments as outlined in the Matrix and Cemetery and Commemoration Work Plan.

General Grave Excavation and Documentation

Outlined below under Stage 4A, if trenching is requested by SHPO, exploratory excavations within areas likely to contain graves are proposed to consist of one or more 1-x-5-meter trenches comprised of a north-south oriented column of five 1-x-1-meter units that will be tied into the site grid. These units will be excavated by arbitrary 10-cm levels within natural strata. If mortuary features (e.g., grave shafts or other evidence of burials) are encountered, excavation will temporarily stop to allow for consultation with SHPO.

General site excavations are proposed to consist of 5-x-5-meter blocks tied to the site grid and excavated as 1-x-1 units by arbitrary 10-cm levels within natural strata. Field notes will be recorded on standardized test unit, burial, and block unit forms and will include unit/block designators, depth, general conditions, amount of cultural material recovered and brief descriptions of the material, and other pertinent information such as presence of and relationships between features. A Munsell chart will be used to record soil colors, and US Department of Agriculture (USDA) soil texture classifications will be used to characterize soil textures.

If mortuary features such as grave shafts are encountered, they will be excavated and screened separately from surrounding soil matrix. Once evidence of a human burial is evident, trowels will be used to excavate soil surrounding the remains (the trowel should not come in contact with bone), while wooden tools and brushes would be used to remove soil from and immediately around the remains. Grave soil will be screened through a 1/8-inch mesh screen to ensure proper collection of smaller human skeletal material and associated cultural materials. Encountered remains will be exposed, documented on a standardized burial form, photographed, and mapped. Prior to removal, osteometric analysis will be conducted in situ. During excavation of burials and/or mortuary features, shade tents or larger event tents can be used to offer some privacy from observation from above. Security cameras have been installed on site and will be monitored by 24-hour surveillance.

The skeletal remains, once removed, will be wrapped in muslin, placed in multiple paper bags, carefully arranged inside a banker's box, and immediately taken to the archaeology laboratory to initiate the analyses and chain of custody processes. Remains from a single interment or individual grave (including human skeletal remains and associated cultural remains [e.g., clothing, buttons, coffin nails and hardware]) will be given the same field specimen number to prevent commingling with other individuals.

Commingled Human Remains

Due to likely subsurface impacts resulting from multiple historical construction episodes, there is a possibility of encountering disturbed, scattered or commingled human remains. To document scattered and/or commingled remains associated with a mass burial, Terracon will follow guidelines outlined in the book *Commingled Human Remains: Methods in Recovery, Analysis, and Identification*[12] for documentation. Once documented and mapped, commingled or scattered human remains can be given field specimen numbers, collected, and analyzed in the archaeology laboratory.

Stacked and Mass Burials

Due to the socioeconomic circumstances associated with many of the people that may be buried within the project area, and the nature of the cemetery's history as a municipal burial ground, there is a possibility of encountering stacked burials and/or mass graves.

Stacked burials are those where multiple interments are placed on top of the other, while mass graves are those that include multiple individuals generally lined up next to one another and sometimes stacked within a single grave shaft or excavation, with or without a coffin. In some instances, particularly in older community cemeteries, coffins or burials were stacked in a grave shaft to save space, sometimes with merely a thin lens of soil placed between the stacked coffins. If stacked burials are encountered, for the purposes of documentation, burials from the same shaft will receive the same burial number followed by a lowercase letter designating that individuals positioning within the shaft (e.g., the uppermost burial being designated 1a and each subsequent burial being 1b, 1c, etc.). Excavation documentation will

[12] Adams, Bradley, and John Byrd. 2014. *Commingled Human Remains: Methods in Recovery, Analysis, and Identification*, First edition. San Diego, CA.

follow the procedures outlined in the General Grave Excavation & Documentation section above, while analyses will be described below.

Mass burials will be fully exposed to document the association and context between the individual interments. If there are multiple layers of remains in a mass grave pit, the layers will be removed and documented one layer at a time to preserve the relationships and circumstances between the deposits. Once documented with standardized unit notes and relevant burial forms, the remains will be photographed (to include close-up and overview shots) and mapped. Remains of the same individual will be given the same field specimen number, while commingled or scattered human remains will be given field specimen numbers, collected, and analyzed in the lab. For transport and temporary storage in the lab, skeletal remains will be wrapped in muslin, placed in individual labeled paper bags and boxes and taken immediately to the laboratory.

Human remains will not be left exposed overnight. The remains will be respectfully covered, the open grave shaft or mortuary feature will be covered with plywood and a tarp, and 5-gallon buckets and/or sandbags can be used to secure the tarps and plywood in case of inclement weather.

Analysis and Reporting

For transport and temporary storage in the laboratory, skeletal remains will be wrapped in muslin, placed in individual, labeled paper bags (plastic bags trap moisture and should be avoided) to prevent further commingling, and taken immediately to the onsite archaeology laboratory. In the laboratory, a bioarcheologist or forensic anthropologist will conduct non-destructive analysis of the remains. Intact bones will be measured and documented, and analysis should include a minimum number of individuals (MNI) present based on the morphological and taphonomy traits.

For intact individual burials, a bioarchaeologist or forensic anthropologist will use dry brushes to remove sediment from human remains and then analyze the remains to document any taphonomic or morphological traits. The analysts will attempt to create a biological profile for the individual including determining sex, age, and stature, when possible. The long bones, skull, and pelvis will be recorded through a series of measurements using an osteometric board. The goal of this analysis is to determine information about the individuals interred at the cemetery, including age, sex, and stature. Pathology (dental wear, healed fractures, evidence of disease) can provide information about the population living at that time, including nutrition and disease.

Following the initial documentation, and with the funeral director's approval, Terracon plans to transport recovered human remains daily to its Charleston office for documentation (e.g., measurements, photography) and secure temporary storage. Storage of human remains will comply with 36 CFR 79, which requires:

- Placement in a locking cabinet or closet with keyed locks inside a locked office
- Fire detection and suppression systems
- Climate control to maintain appropriate temperature and humidity

- Protection against water damage, pests, and other environmental risks

Some members of the community have expressed interest in conducting DNA testing on recovered human remains. This process requires the removal and destruction of samples of bones or teeth to extract genetic material. While some community members may value the scientific and cultural insights such testing could provide, others have expressed that it amounts to desecration and strongly oppose such analysis. The CEC should determine whether DNA testing is warranted; however, this specialized analysis is not included as part of the current work plan. The College, in collaboration with the CEC, will help direct the extent of these sensitive analyses with agreed upon review and updates to SHPO.

Associated cultural remains may include personal effects (such as buttons, textile fragments, or jewelry) as well as materials associated with the burial (shroud pins/rings; coffin nails, thumbscrews, or hinges; coffin grip plates, handles, and coffin wood; and potentially grave markers). Potential biological or artifact indicators of cultural affiliation will be noted, if present (e.g., grave goods, personal effects). These materials would be cleaned, cataloged, and analyzed (see Archaeological Work Plan). Artifacts associated with graves would be given the same field specimen number and would be stored and reinterred with the associated human remains.

Following completion of excavations and analyses, the results of the excavations and skeletal analysis will be included in the Data Recovery Report for the archaeological investigation. Photographs of human skeletal remains will not be included in the final report but will be documented in an appendix that should be removed from the document prior to publication or distribution. The technical report will adhere to the requirements of the *South Carolina Standards and Guidelines for Archaeological Investigations,* updated 2024. Following review and acceptance of the final report, Terracon will provide hard copies and a digital PDF of the technical report to the SC SHPO and SCIAA. The results of the investigations may also be presented in a public information component, to be determined in consultation and collaboration with stakeholders.

Terracon will retain human remains only until they are collected by the project's funeral director. It is expected that human remains will be turned over to a certified funeral director within 24 hours following completion of the analysis. All transfers of cultural materials, including human remains, will be documented using chain-of-custody forms. These forms must be accurately maintained at all times, with the original retained by the Terracon field director and copies submitted alongside curated cultural materials.

PROPOSED STAGES OF WORK

Prior to initiation of field investigations, the project area will be assigned an archaeological site trinomial and recorded with SCIAA with the understanding that the site boundaries and components may be amended following completion of the investigations. Archaeological investigations will be conducted in six proposed stages (Stage 1, 2A, 2B, 3, 4A, 4B), described below. See Appendix D for the summary matrix.

Stage 1: Pre-Disturbance GPR Survey

This investigation was conducted by an independent researcher who is not affiliated with or supported by Terracon. The independent researcher is associated with the College of Charleston, and Terracon understands that Stage 1, the pre-disturbance GPR survey, was completed on the existing parking surface in February 2026. SHPO is aware of this and is requesting a separate GPR plan and a report from the College for this task. Terracon is not responsible for preparing or submitting a Stage 1 work plan or any subsequent technical report for SHPO review. Any work plan or reporting associated with the Stage 1 survey is the sole responsibility of the independent researcher and the College of Charleston.

Stage 2A: SWPPP Best Management Practices (BMP) Perimeter Installation

Prior to any ground disturbance, and as a requirement of the CZC permit, a Stormwater Pollution Prevention Plan (SWPPP) (Appendix I) is required to reduce pollutants in stormwater runoff from the project area. Per the project SWPPP, controls, or best management practices (BMPs), will include the installation of perimeter fencing, tree barricades, and silt fencing. An archaeological monitor will be present during this stage of work.

Perimeter Fencing: The project area will be surrounded by a six-foot tall chain construction fence with privacy screening and locking access gates that will be installed one foot from the parcel boundaries. In areas with existing structural walls or fencing, perimeter fencing will be extended to the wall or fence. In accordance with SC Code 16-11-600 (Notice of trespassing), “No Trespassing” signs will be posted in at least four (4) conspicuous locations around the site, including corners and all primary entry/exit points.

Tree barricades: Tree barricades will be installed around existing monitoring wells as well as trees along the eastern side of the parcel where no ground disturbance is anticipated. Tree barricades are intended to protect trees from soil compaction, root damage, and/or trunk damage. They will be placed at the edge of the tree’s root protection zone or drop line. Tree barricades must be at least three feet in height, but for the current project they will likely include six-foot chain-link fencing used for perimeter fencing.

Silt fencing: Silt fencing will be installed one foot from the perimeter fencing along the west, north, and east sides of the parcel, but not along the south side of the parcel which is bounded by the extant AT&T structure. The silt fence installation will require the excavation of a thin

shallow trench, and the placement of the silt fencing, which will be secured and held in place by metal T-posts. A mechanical trencher (such as a “Ditch Witch”) will be used to excavate a trench approximately six inches wide and six inches deep. The fencing material will be placed into the trench and secured by driven T-Posts approximately two feet deep, and finally, the trench will be back filled.

Additionally, during this stage of the investigation, an arbitrary site grid will be established within a GIS framework to serve as spatial control for all subsequent archaeological fieldwork. All archaeological testing methods (e.g., shovel test pits, excavation units) and geophysical survey datasets (e.g., ground-penetrating radar, magnetometry, electrical resistance) will be georeferenced to this grid, ensuring uniform spatial control, precise provenience recording, and seamless integration of datasets. This approach will allow for consistent mapping, comparative analysis, and accurate correlation of subsurface anomalies with archaeological features throughout the duration of the project.

Due to the potential for encountering cultural features or human skeletal remains, an archaeological monitor will be present during all ground disturbance work. The following summarizes the steps to be taken if human remains are encountered during archaeological monitoring (refer to Protocol for Unanticipated Discoveries):

1. Stop all ground disturbing work in the immediate vicinity.

2. Establish a 25-meter buffer around the unexpected discovery.

3. Call the Charleston County Coroner to analyze the remains.

    a. If they are determined to be associated with modern human remains, they will be taken by the coroner or law enforcement for investigation.

    b. If they are determined to be associated with historical human remains, they will be left in place or returned to the archaeological monitor.

Other than by the County Coroner, human remains cannot be removed from the site unless the local governing body, the City of Charleston, approves the removal. Therefore, if the remains are returned to the archaeological monitor:

1. The monitor will document the remains using scaled photographs and detailed notes to document the remains, the incident, and the results but will not excavate or further disturb the remains.

2. Since human remains cannot be taken offsite at this stage, the remains will be left on site, reburied in place, and their location recorded and georeferenced using GPS.

Installation of SWPPP BMPs is expected to require no more than one-two weeks. Accordingly, unless intact cultural features or human remains are encountered during this work, Terracon anticipates submitting a single archaeological monitoring memo to SHPO following the completion of BMP installation.

Stage 2B: Geophysical Survey Enabling Demolition

This stage of the work plan includes the demolition and removal of the existing YWCA structure as well as hardscape removal (e.g., asphalt pavement) from the project site to facilitate the geophysical survey. Trees on site will be cut to grade; however, no stump removal or stump grinding is proposed to limit subsurface disturbance. Existing utilities that traverse the site will remain in place but will be cut and terminated at the street for safety purposes.

As a result of prior development and site disturbance, there is a higher probability of encountering cultural features, including human skeletal remains, near the ground surface. As such, archaeological monitors will be on site during all geophysical survey-enabling demolition, including pavement removal and the demolition and removal of structural remains associated with the YWCA. Terracon will notify SHPO at least 24 hours prior to fieldwork to inform them that the archaeological monitors will be present in the field and will provide the approximate proposed duration of monitoring activities.

Archaeological monitors will be present during all demolition work and subsurface disturbances. Terracon proposes that monitors operate in pairs, with two monitors assigned to each mechanical excavator. If multiple excavators are in use, each will have its own team of two monitors throughout the demolition activities. Archaeological monitors will have experience and/or training in the identification of human remains.

If intact archaeological deposits are encountered during monitoring, the monitors will instruct the mechanical excavator to stop work and/or relocate no fewer than 25 meters away while the feature is documented. If cultural features are encountered during this work, they will be preliminarily documented (photographed, sketch map, notes, and securing the feature from additional impacts) but not excavated. Terracon will immediately consult with SHPO upon the identification of intact cultural features and/or human remains to determine an appropriate course of action. This consultation may be initiated by telephone call or email depending on the situation. If building remains or nonmortuary cultural features are encountered, an email will be sent to update SHPO. If human remains are encountered, SHPO will be updated by telephone following the call to the county coroner (see *Protocol for Unanticipated Discoveries*, below).

Other than by the County Coroner, human remains cannot be removed from the site unless the local governing body, the City of Charleston, approves the removal. Therefore, human remains, if encountered, will remain in place. The monitor will document the remains using scaled photographs and detailed notes to document the remains, the incident, and the results but will not excavate or further disturb the remains. Remains will be left on site, reburied in place, and their location recorded and georeferenced using GPS.

Archaeological monitors will be given sufficient time to inspect exposed areas and/or record cultural materials and/or features. “Sufficient time” is variable based on feature type, size, and complexity. An archaeological monitor can generally conduct preliminary documentation activities (photography, sketch plan, notes, and securing the feature from additional impacts)

within an hour; however, if additional time is required work can continue in another portion of the site, under the supervision of a monitor, while the feature is documented to SHPO standards.

Following completion of monitoring, an Archaeological Monitoring Technical Memorandum will be submitted to SHPO for review. This Technical Memorandum will highlight the general monitoring activities, including documenting the demolition with photographs and detailing any cultural features or material encountered during monitoring, as well as any SHPO consultation or communication that may have resulted during work. Terracon will provide the SHPO with a detailed description of the features and sufficient supporting documentation to aid them in rendering an NRHP eligibility determination. An appendix will be included documenting any human remains, if encountered, as well as the georeferenced location where the remains were encountered and reburied.

Stage 3: Post-Removal Geophysical Survey

Following the demolition of the extant YWCA structure and the removal of the asphalt paving, Terracon proposes to conduct a geophysical survey of the project area. The geophysical scope of work consists of field exploration, data processing, and reporting. Ground Penetrating Radar (GPR) Electromagnetic Induction (EMI) are proposed for this stage. The use of a second geophysical instrument (EMI) increases our ability to confidently interpret results from any given project; this is especially true concerning historical cemetery sites.

The overall goal of this part of the investigation is to help determine possible number and locations of possible burials and/or concentrations of cultural features including structural footprints and/or remains. In addition, it is anticipated that the geophysical surveys may identify areas unlikely to contain buried cultural features or remains, as well as areas with non-historic period disturbance. It is anticipated that these surveys will inform the planning of subsequent archaeological investigations. The results of these surveys will provide information vital to the success of the exhumation component of this project. A description of specific instrumentation, methods, and anticipated results is presented below.

Prior to the initiation of field investigations, Terracon proposes to meet with SHPO to review geophysical methodologies.

Geophysical Field Exploration Methods

The geophysical survey should be undertaken immediately following the removal of pavement. Prior to the survey (Stage 2a) a grid will be established in GIS and will consist of 30-x-30-m blocks. The survey transects will be conducted approximately north to south to maximize the potential for crossing unmarked graves, which are typically oriented approximately east to west. An Emlid Reach RS2+ real-time kinematic global navigation satellite system (RTK GNSS system) with a horizontal accuracy of 0.7 cm and a vertical accuracy of 1.4 cm will establish the geophysical survey baselines and permanent datums at each survey location. Subsequent archaeological investigations will be referenced to this geophysical survey grid.

GPR data will be collected utilizing baselines established at each end of the survey area to ensure that transects are collected parallel to one another and to minimize gaps between transects. GPR field data collection would follow standards referenced in ASTM D6432. The GPR survey would utilize a 250 MHz antenna made by Sensors and Software (S&S), or similar, using transects spaced 25 cm apart with a trace interval of 2.5 cm. Data would be taken back to the office to be processed utilizing Geolitix, engineered by Geolitix Technologies, Inc. Data from the survey will be combined and interpreted in the GIS program QGIS, engineered by the QGIS Development Team, or similar. Data will be provided in the form of processed geophysical data, ESRI Shapefiles (Point, Line, and Polygon) in the coordinate system UTM Zone 17 North, and an interpretive map with anomaly locations and classification (Rank 1 – Rank 3), which will be accompanied by an anomaly table that includes comments and anomaly centroid positions in the UTM Zone 17 North.

The EMI survey will utilize a CMD-MiniExplorer 6L electromagnetic conductivity meter, or similar. Data will also be collected in 30-x-30-m blocks, or similar, along the same axis as the GPR survey. EMI data will be collected in 25 cm transect spacing to ensure the data is sufficiently dense. EMI data will be processed in Terrasurveyor64, or similar.

Data Analysis and Reporting

It is expected that the results of the geophysical surveys will help inform the subsequent archaeological excavations, determine the expected number of burials and/or cultural features, and the placement of Terracon's field infrastructure, including the placement of screening stations, a portable field office/lab trailer, a ground water-dewatering station for contingency purposes, and a geophysical enabling demolition laydown/staging area. In addition, prior soil borings and the resulting soil profiles produced may also provide useful data regarding site stratigraphy and potential depth of deposits (Appendix J).

Following completion of the data analysis, Terracon will provide the SHPO with GPR amplitude depth slices and other requested data for review. In addition to the geophysical data, a Post-removal Geophysical Survey Report will be provided to SHPO summarizing the results of the geophysical survey as well as proposed alterations to the Archaeological Work Plan, if warranted. This geophysical report will outline the methodology and results of the geophysical survey, including an overview of potential anomalies. It should be noted that geophysical methods may be affected by on-site conditions beyond the control of the operator and may be considered inconclusive. Interpretation is based on a combination of known factors combined with the experience of the operator and the geophysicist evaluating the results. The geophysical results provide a level of confidence but should not be considered absolute.

It is anticipated that the results of the geophysical surveys may alter proposed excavation methodologies. These changes in field methodologies will be presented as amendments to the current Work Plan document, as needed. The College will update the public on findings throughout the work performed through multiple means including:

- Email submission to coming-commons@cofc.edu, as listed on the Project 205/Coming Street Commons website: www.coming-street-commons.charleston.edu/get-involved

- Direct engagement with members of the Community Engagement Council (CEC) or public inquiry submissions at CEC public meetings
- Participation in publicly noticed Community Outreach Forums
- Referenced opportunities identified or defined in the applicable Project Work Plans and Procedural Summary Matrix (Appendix D)
- Direct outreach and maintained lines of communication with Federally recognized Tribal Nations, undertaken in good faith and without imposed response deadlines

In accordance with SHPO request dated September 5, 2025. It should be noted that information concerning locational data of human remains will remain redacted until the completion of the project and sensitive information (such as photographs of skeletal remains) will not be made publicly available.

Terracon will not proceed with archaeological fieldwork or the exhumation of burials until: 1) SHPO is given the opportunity to review geophysical data and anomalies/potential burials resulting from the geophysical surveys and 2) 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.

Geophysical work will be undertaken by Alex Corkum, PhD, RPA, a geophysicist with over 17 years of experience conducting geophysical surveys on unmarked cemeteries throughout the United States and internationally (see Figures 1–4 for examples of recent work). Dr. Corkum will be assisted by Joseph Snider, a geophysicist and archaeologist with over 14 years of experience across the United States. Mr. Snider has extensive experience with both geophysical and archaeological fieldwork on cemetery sites and is skilled in managing large datasets.

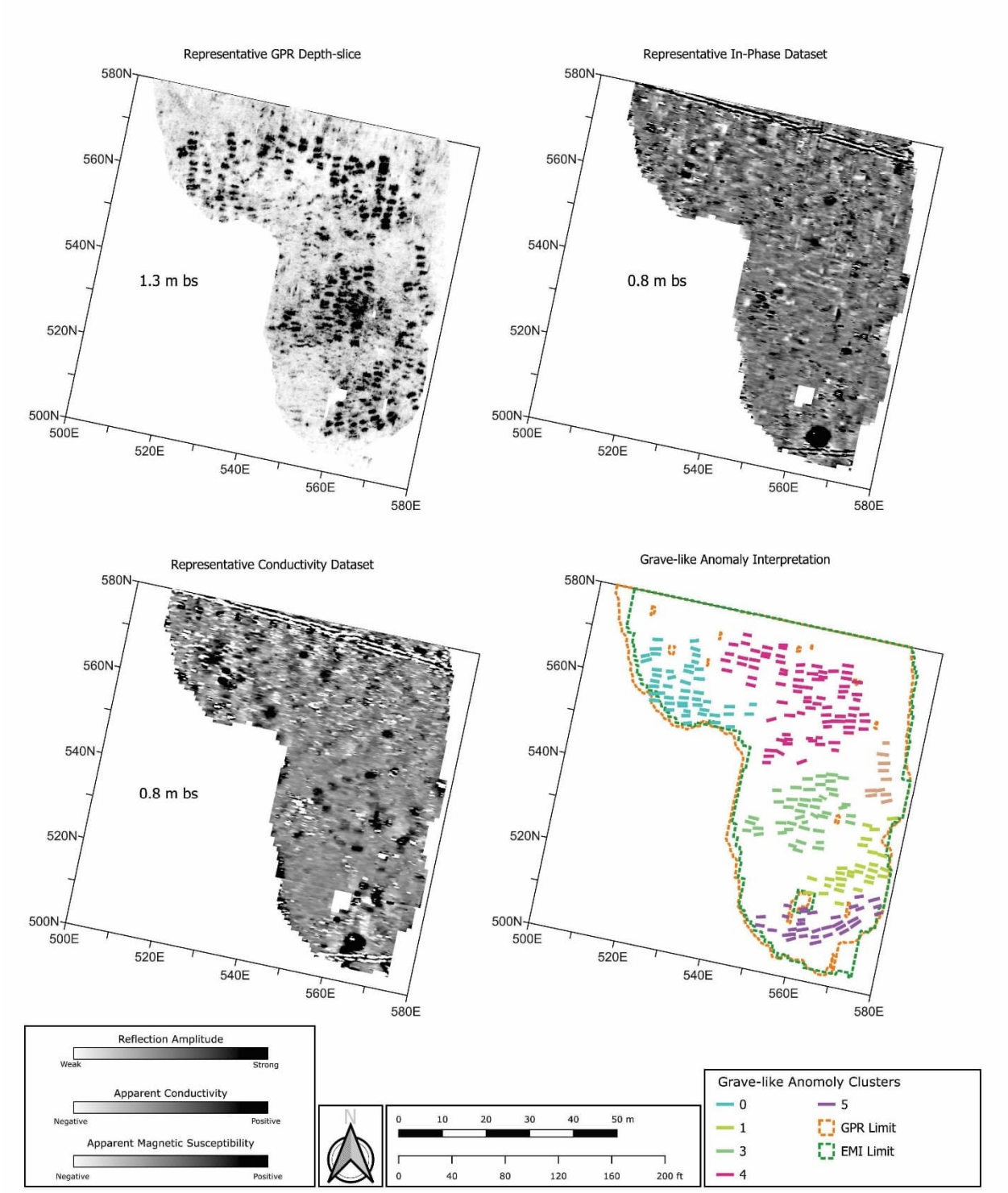


Figure 1 Example Unmarked Cemetery Dataset, showing 250 MHZ GPR and EMI data with Interpretation.

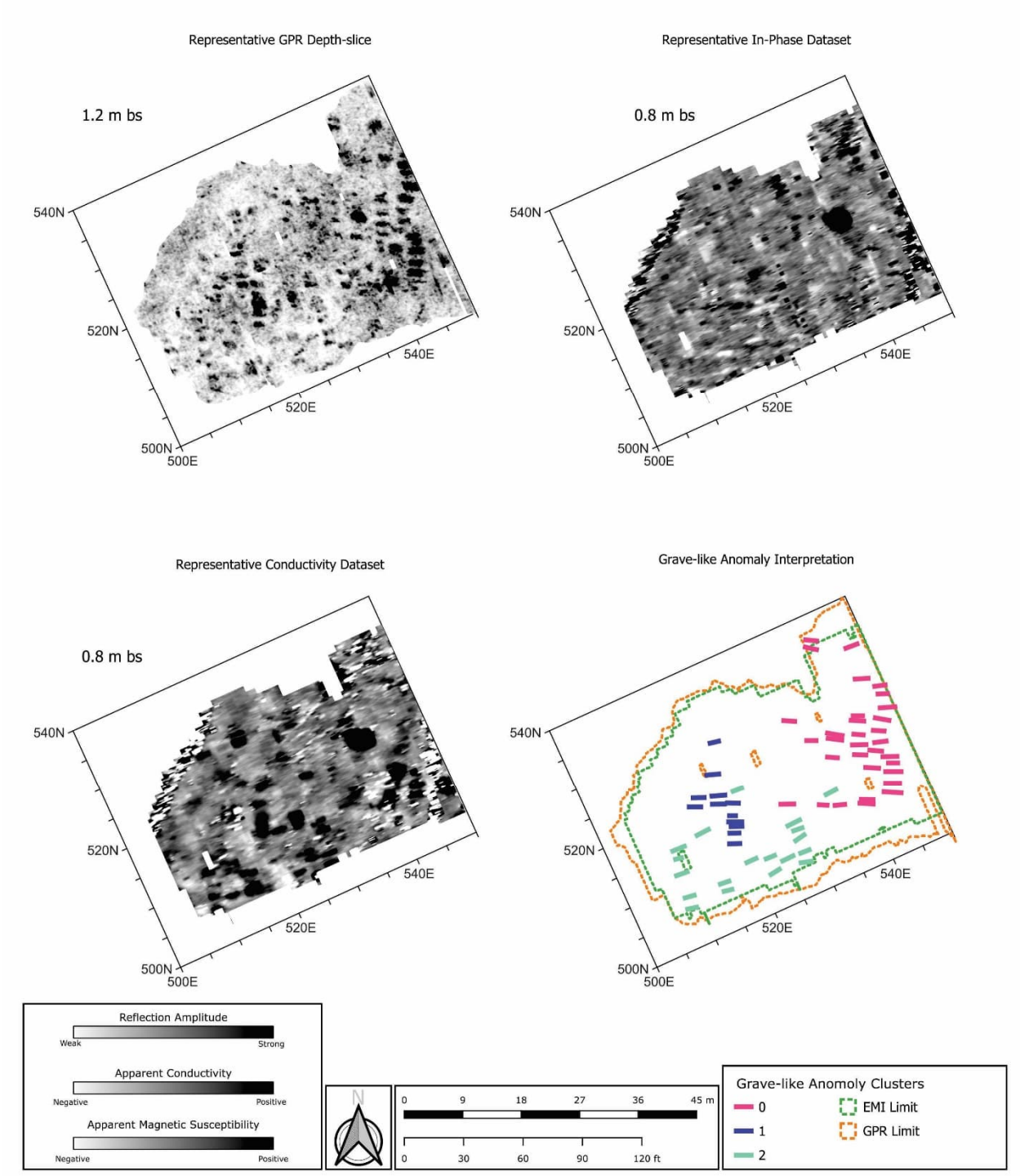


Figure 2 Example Unmarked Cemetery Dataset Showing 250 MHz GPR and EMI data with Interpretation

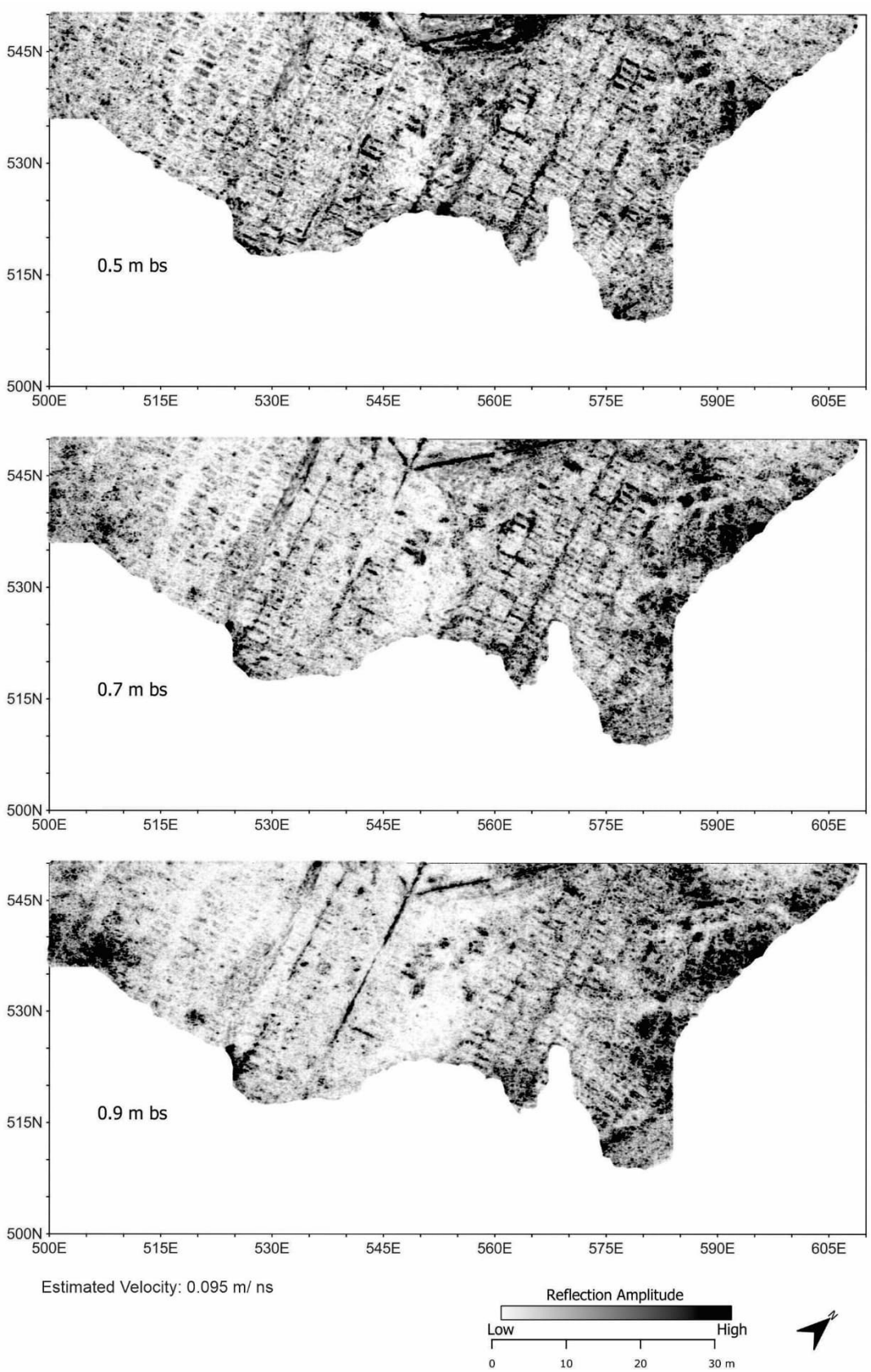


Figure 3 Example of 250 MHz dataset depth-slices from unmarked cemetery.

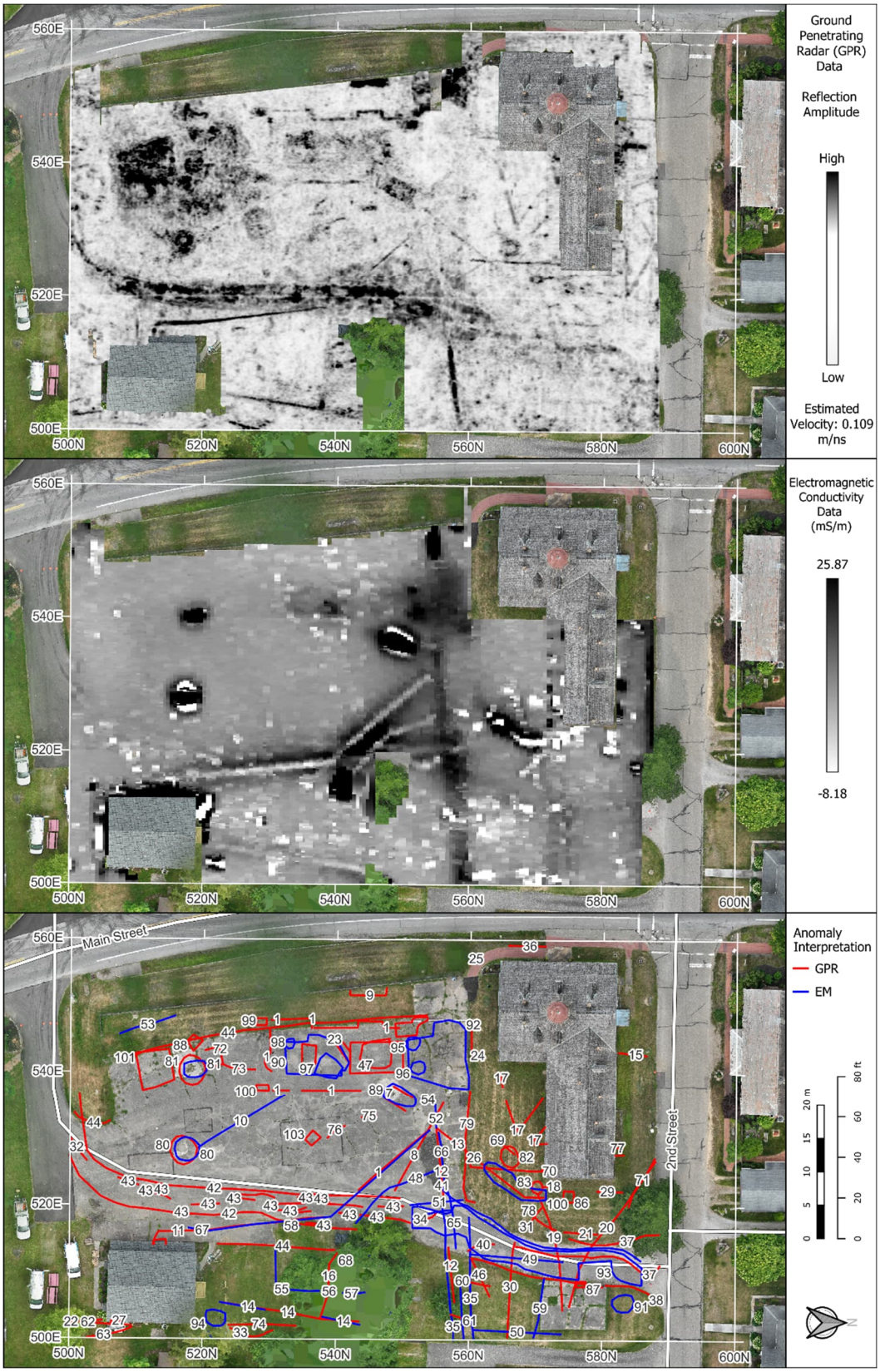


Figure 4 Representative 250 MHz GPR and EMI datasets of Historic Cultural Resources Under a Paved Parking Lot, showing Foundations, drives, garden features, and utilities.

Additionally, Terracon plans to submit the first draft of a stand-alone Research Design to SHPO for review by Stage 3. This Research Design will present relevant background and will articulate the research questions, outline the proposed methodology, detail the laboratory and analytical procedures, specify curation standards and expectations, and describe the data management protocols to be employed.This research design will help establish the context of archaeological materials and/or human remains, if present, as well as define the criteria for National Register of Historic Places (NRHP) eligibility for the site within that context.

Stage 4A: Archaeological Ground Truthing

The goal of this Stage of work is to sample portions of the site to determine subsurface site conditions, investigate anomalies identified during the geophysical surveys, verify, if possible, the limits of burial areas and cultural features, and establish areas for site infrastructure and project access. Terracon will not proceed with archaeological fieldwork or the or removal of burials, human remains, or grave goods until:

1) SHPO has been given the opportunity to review the results of the geophysical data and anomalies/potential burials resulting from the proposed geophysical surveys. The results of this data will inform proposed excavation methodologies and may require amendments to the Archaeology Work Plan, as necessary.

2) The current Work Plan has received approval by SHPO. In addition, prior to initiation of archaeological fieldwork, Terracon will submit a Research Design for SHPO review (see Stage 3).

3) The City of Charleston approves the removal of the cemetery or burial ground and provides the College of Charleston, SHPO, and SCDES-BCM with a copy of the approval documentation.

The goal of this preliminary stage of work is to verify the geophysical survey results. As such, limited trench excavations, and possibly mechanical stripping, are proposed to sample these areas (specific areas to be determined in consultation with SHPO follows completion of the geophysical survey). Following meetings with SHPO, initial archaeological ground truthing will focus on five main areas based on the results of the geophysical surveys:

1) Areas of planned SWPPP infrastructure (dewatering basin and access roads)

The SWPPP and Erosion Control plans indicate that a dewatering basin will be installed in the southwest corner of the project area (due to site elevation). Two construction entrances will also be established: one along Coming Street immediately north of the dewatering basin and one along Vanderhost Street in the northeast corner of the parcel (see attached ESPs). These areas should be investigated and excavated first to facilitate compliance with SWPPP BMPs. Due to the proposed ground disturbance associated with these areas, these portions of the project site should be excavated to a depth of at least one meter or until 30 cm of culturally sterile, stratigraphically intact soil has been documented. If human remains or mortuary

features are encountered during this stage, excavation should stop to consult with SHPO to determine next steps. See proposed excavation methodologies below.

2) Areas with no subsurface features detected

It is anticipated that site infrastructure will be established in areas that do not include cultural features. The geophysical results and the site design plan noting the presence of known utilities will be used to determine the best locations for the placement of the dry screening stations, field office/lab trailer, and geophysical enabling demolition laydown/staging area. If the geophysical data do not indicate open spaces or areas devoid of potential cultural features located within the project area, then the most logical locations for their placement may be excavated first to make space for the project infrastructure.

Provided that doing so will not require traversing potential subsurface features, Terracon recommends using a backhoe to mechanically strip the identified areas for ground-truthing, see methodology below.

3) Areas suggestive of commingled or truncated human burials

If present, mortuary features—such as grave stains, mass burials, truncated or impacted burials, and pockets of commingled remains—are expected to be systematically excavated during Stage 4B. During the preliminary Stage 4A investigations, areas identified by geophysical surveys as potentially containing truncated or otherwise disturbed burials will be examined to assess the extent of subsurface disturbance and the condition of any remains.

To ground-truth these anomalies, Terracon recommends excavating a 1-x-5-meter trench along the edge of the suspected feature. If human remains are encountered, they will be documented in situ and left undisturbed. Once a mortuary feature is confirmed and adequately recorded, the excavation unit and feature will be covered with a tarp, backfilled to a safe depth, and clearly flagged to prevent accidental disturbance prior to formal excavation.

4) Area of potential historic period structural remains.

These areas may have indications of buried foundation remnants, such as piers, footing, cisterns, or other buried cultural features potentially associated with the historic period occupation of the property. The goal of this preliminary stage of work is to verify the geophysical survey results. As such, limited trench excavations are proposed to sample these areas (specific areas will be determined in consultation with SHPO following the completion of the geophysical survey).

To ground-truth the buried foundation remnants, Terracon recommends excavating a one-meter-wide trench, extending up to five meters in length (longer if necessary for evaluation purposes), positioned to intersect the edges or corners of the identified anomalies. This approach will aid in determining the nature of the potential feature, the degree of subsurface disturbance, and, where feasible, its temporal affiliation.

5) Areas with no modern disturbance

These are areas of the site where the geophysical survey suggests little to no modern disturbance or intrusions from utilities or other infrastructure are present. These portions of the site, if extant, have a higher probability of intact subsurface deposits and burials. Limited trench excavations in these areas may be undertaken to investigate the site's potential for the presence of areas of intact subsurface stratigraphy.

To ground-truth these areas, Terracon recommends excavating a 1-x-5-meter trench, oriented north-south, to investigate site stratigraphy and determine if intact soils are present.

If human remains are encountered, they will be documented in situ and left undisturbed. Once a mortuary feature is confirmed and adequately recorded, the excavation unit and feature will be covered with a tarp, backfilled to a safe depth, and clearly flagged to prevent accidental disturbance prior to formal excavation during Stage 4B.

SHPO Updates

While archaeological excavation (Stages 4A and 4B) is ongoing, Terracon will submit bi-weekly updates to SHPO via email. These updates will be emailed the Monday immediately following the two-week period. If circumstances are encountered that require a significant change in site methodology, SHPO will be contacted on the telephone immediately to schedule a site visit to promptly discuss.

Archaeology Ground Truthing Methodology: Trench Excavation

Terracon proposes excavation of exploratory trenches (typically 1-x-5-meters) in selected portions of the site to ground truth the areas described above. In areas with no subsurface anomalies or features suggestive of human remains or graves, trenches may be excavated along a north-south or east-west orientation but would be tied to the overall site grid. Since historical burials in the region tend to be oriented east-west, a north-south oriented trench presents a higher probability of encountering a row of grave shafts. Exploratory trenches in areas thought to contain human burials units will be excavated along a north-south orientation within the existing site grid, so these areas can be tied to subsequent block excavations and resulting data could be easily incorporated.

Due to the potential for encountering displaced human remains, each 1-x-5-meter trench will be excavated from the ground surface down. Units would be excavated as arbitrary 10-cm levels within natural strata. Each 1-x-1-meter unit would be identified by the northing and easting of the southwest corner. Excavation will continue until mortuary features, if present, can be clearly determined and documented; however, graves will not be excavated at this stage. If human remains or potentially intact cultural features are encountered, Terracon will follow notification protocols outlined above (*Procedures for the Discovery of Human Remains*).

Archaeology Ground Truthing Methodology: Mechanical Stripping

Provided it does not require traversing potential subsurface features, Terracon recommends mechanical stripping in areas where the geophysical surveys did not identify subsurface features, if such areas exist. Mechanical stripping is recommended to efficiently remove overburden, enhance ground visibility, and expose subtle soil variations or cultural features that may not have been detectable through geophysical methods alone.
Archaeological mechanical excavation should be conducted using a backhoe or mechanical excavator equipped with rubber tires rather than treads and fitted with a flat-bladed bucket to facilitate controlled removal of soil in 20–30 cm increments. If soil profiles remain intact and no subsurface features are identified, Terracon recommends proceeding to a minimum depth of one meter. All mechanical excavation will be directed and continuously monitored by a Terracon archaeologist. An archaeologist must be present at all times during mechanical excavation activities to ensure proper identification, documentation, and protection of any cultural materials or features encountered.

All excavation activities will follow standard construction and archaeological safety procedures. A safety buffer zone will be established around the working excavator, with only essential personnel allowed inside the exclusion area. The excavator operator must always maintain clear visual contact with the archaeologist, and work will proceed at slow, controlled speed to minimize risk to personnel and sensitive deposits. Personal protective equipment (PPE), including hard hats, high-visibility vests, steel-toe boots, gloves, and eye protection, is required for all field staff within the excavation area. Work will be suspended immediately if cultural features, human remains, unstable soils, hazardous materials, or unsafe conditions are encountered, and the area will be reassessed to determine whether excavation will resume.

Project Infrastructure

Project infrastructure, including the field office/laboratory and screening stations, will be installed once suitable locations have been identified. Establishing these areas will require clearing through controlled excavation or mechanical stripping. After these locations have been appropriately investigated, documented, and backfilled, installation of the project infrastructure may proceed. Although infrastructure installation is anticipated to begin prior to Stage 4B, it is possible that, if suitable locations are not identified during Stage 4A, portions of the Stage 4B excavations may need to occur before project infrastructure can be installed.

Field Office

The field office/lab is intended to provide secure on-site storage for sensitive electronic equipment and temporary storage of human remains if recovered. The field office is proposed to be along the Vanderhorst Street entrance to the project area, pending the results of the geophysical survey. The field office/lab should include a double lock on all external doors, including a deadlock. A locking cabinet or closet with keyed locks will be kept in the lab to secure human remains and/or grave goods until they are moved to a larger, secure facility, such as the dedicated archaeology laboratory space at Terracon's Charleston office or certified

funeral director's facility. With the permission of the project funeral director, Terracon plans to move any recovered human remains to the Terracon Charleston office daily for further documentation (e.g., measurements, photography). The human remains would be stored in accordance with 36 CFR 79, including in a locking cabinet or closet with keyed locks located inside a locked office with keyed locks; having a fire detection and fire suppression systems, climate control to ensure appropriate temperature and humidity levels are maintained; and protection against water damage, pests, and other external elements. Terracon would only keep the human remains until they are collected by the project's funeral director. Any transfer of cultural materials, including human remains, from one location to another would be documented with chain-of-custody forms, which must be maintained accurately and kept up to date at all times. The original chain of custody form will be retained by Terracon and submitted with curated cultural material.

Screening Stations

Terracon plans to establish multiple screening stations across the project area but will be limited to areas that exhibit no evidence of cultural features or burials (as determined during the ground truthing stage of field investigations). Screening stations will include a bank of portable shakers with wire mesh screens. Soil will be transported to the screening stations via 5-gallon buckets. Buckets will use a color-coded system as a visible reminder to the screeners which unit they are screening for, in addition to labeled flagging tape for each bucket indicating the block, unit, level, depth, and other pertinent provenience information. Mesh screen size will depend on what type of soil matrix is being screened. In general, a 1/4-inch wire mesh screen will be used to sift material; however, in the event that human remains are encountered, a 1/8-inch wire mesh screen will be substituted for recovery of remains or associated cultural materials. Unless site conditions dictate otherwise, Terracon plans to dry screen all soil; however, soil samples may be collected, as warranted, from select cultural features such as privies or disposal pits for later off-site water screening or flotation.

Stage 4B: Archaeological Site Excavation

Stage 4B would focus on the full archaeological site excavation and documentation. During this stage, Terracon would send bi-weekly updates to SHPO. SHPO staff may come to the site for monitoring purposes or for regular updates at any time. No construction is expected to take place onsite while archaeological excavations are being conducted.

Prior to excavation, a 5-x-5-meter excavation grid will be established across the project area using 12-inch spike nails labeled with the northing and easting for each block. This grid will be tied to the geophysical site survey grid established during Stage 2a. The location of the block corners will be recorded with a total station or RTK GNSS system. In addition to labeling the northing and easting for all four corners of each excavation block, to make documentation more efficient in the field, each block will also be given a distinct name comprising of a letter and a number (A-1, B-3, J-10, etc.). A letter will be assigned to each row ascending from A–Z, south to north; and numbers will be assigned to columns and will ascend from west to east.

Due to the potential for encountering displaced human remains, each 5-x-5-meter grid block will be excavated as 1-x-1 units in arbitrary 10-cm levels within natural strata. Each excavated 1-x-1-meter unit would be identified by the northing and easting of the southwest unit corner. Excavation will continue until the soil profile indicates a reasonable depth below disturbed subsoil and two culturally sterile, natural soil levels are encountered.

Soil would be screened through a 1/4-inch mesh screen for standardized recovery of cultural material. Field notes will be recorded on standardized test unit and block unit forms and will include unit/block designators, depth, general conditions, amount of cultural material recovered and brief descriptions of the material, and other pertinent information such as presence of and relationships between features. A Munsell chart will be used to record soil colors, and US Department of Agriculture (USDA) soil texture classifications will be used to characterize soil textures.

If cultural material is encountered it will be placed into 4-mil plastic bags that will be labeled, written in black permanent marker, with pertinent project information including: field specimen (F.S.) number, project number, project name, block number, unit number, level, stratum, depth, crew initials, date, and number of bags associated with that F.S. number. Once a unit is completed, all associated field forms would be reviewed for consistency, readability, and errors, and then turned into the field office/lab with all cultural material recovered from that unit. Unit paperwork and artifact bags will be reviewed by the onsite field director for accuracy and consistency, and any errors or issues will be addressed immediately to ensure quality data recording.

Features

Cultural features will be hand drawn on associated Block Maps, assigned a sequential number based on the order they were recorded, and recorded with a total station or RTK GNSS system. Cultural features would be excavated by methods appropriate to their size and type and in consultation with SHPO, if warranted (see Proposed Field Methodology Overview, above).

If in situ architectural or structural remains that are not associated with historical dumping episodes are encountered during fieldwork, the remains will be assigned a feature number, fully exposed within the excavation units, brushed clean, documented in standardized field notes, measured, mapped, and photographed in accordance with the procedures outlined in Documenting Archaeological Features, outlined above.

Other cultural features (not including burial features) would be excavated by methods appropriate to their size and type and in consultation with SHPO, if warranted. If potential burial features are encountered under or within a feature, structural remains, or within the footprint of a historical building, the documentation and excavation of the burial will be given preference over the documentation of other non-burial features.

Should any non-burial subsurface features contain preserved organic material, representative samples of these materials will be collected for future analysis (radio-carbon dating,

ethnobotanical analysis, faunal analysis). Similarly, a representative sample of preserved wood within a sealed cultural feature context may be for dendrochronological dating or other future analysis.

Archaeological Analyses

Following procedures outlined above, with the exception of potential human remains, cultural materials and artifacts will be processed in compliance with SCIAA's curation guidelines. Artifacts will be washed or brushed free of soil and dried; counted, weighed, and classified; and rebagged in labeled zipper-seal archive-quality bags. Artifacts will be stored at Terracon's archaeology laboratory temporarily until the materials are transferred to SCIAA for permanent curation.

Human remains will be subject to standard osteometric analysis, which will be presented in the final report within an osteometric data chart. The goal of this analysis is to create a biological profile of each individual, to the extent feasible, including sex, age at death, and height, as well as evidence of trauma, disease, or other pathology, if present. In addition to collecting standardized osteometric data, if disarticulated remains are encountered that are not clearly associated with a singular burial, Minimum Number of Individuals (MNI) analyses will be conducted to determine the minimum number of the individuals the remains could represent.

Reporting

Following completion of archaeological excavation and once analyses are completed, a draft Data Recovery Report will be prepared detailing the results of the archaeological investigation. The technical report will adhere to the requirements of the *South Carolina Standards and Guidelines for Archaeological Investigations,* updated in 2024, and will include an updated archaeological site form. Following review and acceptance of the final report, Terracon will provide hard copies and a digital PDF of the technical report to the SC SHPO and SCIAA. The results of the investigations may also be presented in a public information component, to be determined in consultation and collaboration with stakeholders. Additionally, the resulting data will be shared with the College of Charleston to support the work of their faculty and students. Terracon hopes that researchers and scholars will utilize this information to deepen our collective understanding of the people and cultures that inhabited this land before us.

Additional Monitoring

Following completion of archaeological excavations, analyses, and reporting, it is recommended that archaeological monitors remain on site until all subsurface disturbance related to geophysical enabling demolition on site is completed. Terracon will notify SHPO when the proposed archaeological monitor is on site. In the event possible human skeletal remains or cultural materials related to the historic cemetery are uncovered, procedures for unanticipated discoveries (outlined above) should be followed. The onsite archaeological monitor will be responsible for initiating the "Protocol for Unanticipated Discoveries" process,

described below. If possible human skeletal remains are encountered later during construction when archaeological monitors are not onsite the project site manager will be responsible for initiating the Protocol for Unanticipated Discoveries.

Following monitoring, an Archaeological Monitoring Technical Memorandum will be submitted to SHPO for review. This Technical Memorandum will highlight the general monitoring activities, as well as any SHPO consultation that may have resulted during work.

PROTOCOL FOR UNANTICIPATED DISCOVERIES

Although archaeological monitors will be present onsite during subsurface disturbance related to the project, the following procedures were developed to provide contractors and other on-site personnel with general referenced information for protocols to be followed in the event that cultural remains are noted. Prior to the initiation of project work, the lead monitoring archaeologist would advise on-site project contractors to be on the alert for evidence of the presence of archaeological resources and cultural materials, of how to identify these expected resources, and of the appropriate protocol in the event of apparent discovery of an archaeological resource or possible human remains.

If potential intact archaeological features or subsurface artifact concentrations related to the historic period occupation of the site are encountered, soil disturbing activities in the immediate vicinity would be temporarily halted and construction crews and heavy equipment would be redirected to another portion of the site until the resource is documented and evaluated. The on-site archaeologist would assess the identity, integrity, and significance of the encountered archaeological resource in consultation with SHPO, detailed above (Documenting Archaeological Features). If potentially significant cultural features (such as intact structure foundations, privies, or other larger features) are uncovered during the geophysical enabling demolition efforts, temporary avoidance of these areas by ground-disturbing activities may be necessary pending additional SHPO coordination and/or a site visit. The area surrounding the cultural feature would be secured and marked as an avoidance area with surveyor's flagging tape and ground stakes. It is expected that geophysical enabling demolition work would progress elsewhere on the site and that such avoidance would not cause significant project delays.

The intent of archaeological monitoring is to identify and assess intact, subsurface cultural features and artifact concentrations as well as potential burials or human remains. With the exception of a representative sample of temporally or culturally diagnostic artifacts (which may be collected, as warranted, from disturbed fill or exposed ground surface), no systematic collection of unprovenienced artifacts or cultural materials from previously disturbed deposits or construction fill would occur. Similarly, analysis would be limited to artifacts and cultural materials recovered from intact feature contexts, discussed below.

In the event that human remains (or possible human remains) are encountered by contractors during geophysical enabling demolition on the proposed project site, ground disturbing work will be stopped within a 25-meter perimeter of the remains, and the Charleston County Coroner's Office will be contacted at the number provided below to confirm the remains are not modern (see *Procedures for the Discovery of Human Remains*, above). Although the Charleston County Coroner is aware of the proposed project, they will be informed of the nature of the work, given a description of the remains, and the project location address. The site superintendent will then contact the SHPO within 24 hours of the unexpected discovery. If the remains are determined to be historic aged, Terracon archaeologists can be mobilized to map, excavate, document, transfer the remains to the Terracon lab for detailed analysis,

and subsequent transferal to the certified funeral director once analysis is completed, per the protocols outlined above.

Contacts for notification of unanticipated human remains discoveries are:

- Charleston County Coroner: (843) 476-4030
- Primary SHPO Contact: Robert Larsen at (803) 896-6181 or rlarsen@scdah.sc.gov
- Secondary SHPO Contact: John Sylvest at (803) 896-6129 or jsylvest@scdah.sc.gov
- Emergency: 911
- Non Emergency CofC Police: 843.953.5609

In the event that geophysical enabling demolition proceeds without an archaeological monitor on site and any damage or subsurface impacts should occur to the site as a result of proposed geophysical enabling demolition activities, or on-site vandalism is noted, the damage must be documented in accordance with the SHPO document, *Guidance for Assessing Damage to Archaeological Sites*[13]. Failure to do so can result in felony for the destruction or desecration of human remains, which is punishable with at least one year and not more than 10 years in prison and a maximum fine of $2,000 (SC Code 16-17-600). If damage occurs during the proposed archaeological investigation, appropriate law enforcement, SCDES-BCM, and SHPO should be contacted so potential site damage can be appropriately documented. This documentation would include a letter report to be submitted to SHPO and SCIAA.

[13] State Historic Preservation Office, South Carolina Department of Archives and History. 2023. *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

GLOSSARY OF TERMS

36 CFR 60.4: Federal regulation defining NRHP eligibility criteria.

36 CFR 79: Federal regulation governing curation of archaeological collections.

Accession Number: Unique ID assigned to cataloged artifacts.

Amplitude Depth Slice: GPR image showing reflections within a range of depths.

Anomaly (Geophysics): A subsurface reading that differs from background soil patterns.

Archaeological Materials: Physical objects, artifacts, features, or other evidence resulting from past human activity.

Archaeological Monitoring Final Report: A report consolidating archaeological monitoring activities, findings, and recommendations from weekly memos.

Artifact: object made or used by humans; typically greater than 50 years of age, though the definition may vary by regulatory context.

Bioarchaeologist / Forensic Anthropologist / Skeletal Analyst: Specialists analyzing human skeletal remains.

Block Excavation: A method using a grid of square excavation units.

Burial Features: may include human skeletal remains, grave shafts, coffin remnants, or other indications of human burial locations.

Chain of Custody: Documentation showing who handled materials at each stage.

Clean Water Act (CWA): Federal law regulating pollutant discharges and establishing the NPDES program.

Coastal Zone Consistency (CZC) certification: 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 a balance between development and conservation of coastal resources such as wetlands, cultural resources, state endangered/threatened species, and shellfish beds. Consultation with State Historic Preservation Office.

Commingled Remains: Bones belonging to multiple individuals mixed together.

Criteria Considerations (NRHP): Special rules determining eligibility for property types like cemeteries.

Cultural Feature (Archaeology): Non-movable evidence of past human activity, such as a trash pit or foundation. May include Burial Features.

Cultural Resources: Physical evidence of past human activity including archaeological sites, structures, landscapes, and artifacts.

Culturally Sterile Soil: Soil that contains no evidence of human activity.

Curation: Long-term care and preservation of artifacts and records.

Department of Environmental Services (DES) / Bureau of Coastal Management (BCM): State offices that issue and manage environmental and coastal permits in South Carolina.

Descendant Community: People connected by ancestry or heritage to those buried or historically present.

Dewatering: Removal of groundwater from an excavation area.

Diagnostic Artifacts: Artifacts whose characteristics help identify age or cultural affiliation.

Disarticulated Remains: Bones no longer in anatomical order.

Disinterment: The lawful removal of human remains.

Electromagnetic Induction (EMI): Method measuring soil conductivity to detect buried features.

Ground Penetrating Radar (GPR): Geophysical method using radar waves to detect subsurface features.

Human Remains: physical remains of a deceased individual, may include bones, teeth, cremated remains, or other skeletal or soft tissue materials associated with a human body.

In situ: In its original place of deposition or discovery, undisturbed.

Laydown/Staging Area: Designated location for tools, materials, and equipment.

Mass Burial: Burial containing multiple individuals interred in a single grave or depositional context (Mass Grave).

Midden: A historical trash or refuse deposit.

Minimum Number of Individuals (MNI): The smallest number of individuals represented by recovered bones.

Munsell Color Chart: Standard tool for describing soil color.

Muslin Wrapping: Breathable cloth used to protect human remains during transport.

NAGPRA (Native American Graves Protection and Repatriation Act): Federal law governing treatment and repatriation of Native American human remains and cultural items.

National Pollutant Discharge Elimination System (NPDES): A permit program that controls water pollution by regulating discharges to surface waters.

National Register of Historic Places (NRHP): Official list of historically significant U.S. sites.

Osteometric Board: forensic laboratory tool used to make linear measurements of skeletal long bones.

Osteometry: measurement of skeletal material; the study of humans through skeletal analysis.

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.

Pre-Disturbance GPR Survey Report: Report documenting ground-penetrating radar methodology and results prior to any ground disturbance.

Privy: A historical outhouse pit that often contains preserved artifacts.

Provenience: The exact recorded location of an artifact or sample in three dimensional space.

Research Design: A formal document outlining research goals, methodology, analytical approaches, and data management strategies for an archaeological investigation. Establishes historical context, theoretical framework, research questions, and comparative studies (case studies).

Reinterment: Respectful reburial of human remains after study.

RTK GNSS: High-precision GPS used for mapping with centimeter-level accuracy.

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.

SC Code 16-11-600 Notice of trespassing: Defines trespassing as entering another's land after notice prohibiting entry has been given by the owner or tenant. Notice may be established either by posting signs in at least four conspicuous locations along the property boundary or by marking boundaries with clearly visible purple paint stripes meeting specified size, height, spacing, and visibility requirements. Such posting constitutes legally conclusive notice, and unauthorized entry thereafter is a misdemeanor punishable by a fine up to $100 or imprisonment up to 30 days.

SC Code 16-11-780: Prohibits entering lands without permission to locate, disturb, remove, or attempt to remove archaeological resources; violations may result in criminal penalties.

SC Code 16-17-600: South Carolina's primary criminal statute protecting human remains, graves, cemeteries, burial vaults, and associated markers.

Screening: The process of passing excavated soil through mesh to recover artifacts.

Stacked Burial: interment of more than one individual in a single grave shaft; typically placing one casket or burial atop another.

State Historic Preservation Office (SHPO): State office reviewing projects for potential effects on historic properties.

Stratum / Strata: A soil layer formed at a particular time.

Taphonomy: Post-burial processes affecting preservation of remains.

Transect: A line established during survey to collect systematic data.

U.S. Environmental Protection Agency (EPA): Federal agency overseeing environmental protection and delegating permit authority to states.

Unanticipated Discovery Plan (UDP): Procedures to follow when unexpected artifacts or remains are discovered.

Undertaking (federal): A project involving federal funding, approval, or permits, triggering federal historic preservation review.

Work Plan Amendment(s): Formal change, modification, or addition made to a Work Plan for the purpose of clarifying, updating, correcting, or improving content. An official part of the original document once adopted, the amendments are used to reflect new information, evolving circumstances, or stakeholder input while maintaining the integrity of the underlying framework of the original Work Plans.

APPENDIX A: COLLEGE OF CHARLESTON MITIGATION ASSESSMENT

College of Charleston Mitigation Assessment

Founded in 1770, the College of Charleston sits in the heart of the Historic Charleston peninsula. The College currently owns and operates over 190 buildings, spanning three campus locations with more than 120 of those structures classified as historic. As a longtime community member and steward of historic preservation, the College of Charleston is committed to the delicate balance urban universities face when managing the relationship between the institution and the surrounding community. A critical component of that town-gown interplay is on-campus student housing. To that end, the College of Charleston for the last 30 years has continuously worked to provide as much affordable, on-campus student housing as possible. However, the College is only able to house approximately 3,400 students, which puts it far below the national average of universities that house more than 40% of their undergraduate populations.

Creating more affordable student housing on campus will provide benefits to both the College and the greater community. Research consistently demonstrates that university students who reside on campus tend to achieve higher academic performance and exhibit greater retention rates compared to their of-campus peers. Additionally, providing more on-campus housing eases pressures on surrounding neighborhoods.

Being situated in a dense urban historic city, the College has found opportunities for development are limited:

- Scarcity of raw land
- Options of demolition and rebuild are limited due to the historic nature and existing lot size limitations
- Acquisition of historic structures to renovate or add to for large-scale needs is often difficult to incorporate modern building code or system requirements without reduction of usable living space

The College of Charleston understands the obligation, duty, and commitment to the community to investigate alternative options that would avoid harm to the cultural resources located at 106 Coming Street and 99 St. Philip Street. The properties and ventures outlined below demonstrate the College's efforts over the last six years to seek and find alternative viable options for large-scale residential housing that meet the campus needs and balance the economy of scale for construction.

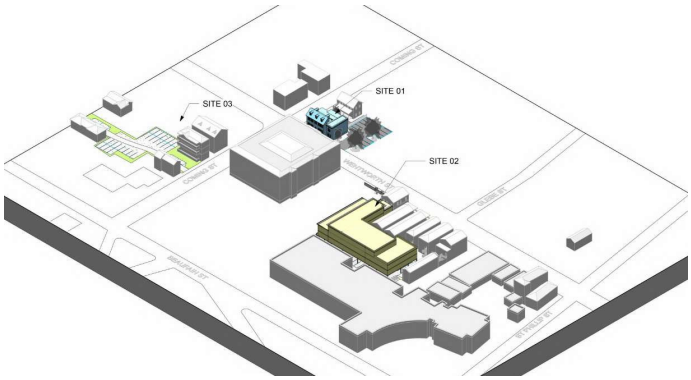
1. ***363-369 King Street***
    a. Assemblage of 3 parcels on King between retail outlets Urban Outfitters and Williams Sonoma.
    b. Beztak Properties designed and took through BAR a residence hall project.
    c. New 7-story
    d. Beztak could not make the project work financially.
        i. As part of an easement process, the College was able to secure a ROFR, and when Beztak decided to not move forward with their project, the College exercised that option.
    e. After several months of due diligence, the College also could not make the project work financially.



2. ***New Residence Hall LX (Lightsey Annex)***
    a. A new residence hall built on land currently owned by CofC on the small footprint behind Berry/Lightsey/McAlister residence hall structures.
        i. Site of the old Sears tire center
    b. New 6-story building (currently zoned for 5)
    c. Only provided 180 beds



3. ***Various Alternatives on Foundation Property along Wentworth/Coming***
    a. New construction behind the old Greek houses on Wentworth Street (97–107 Wentworth)
        i. Very small project, less than 10,000 square feet; did not meet the need and took current parking online.
        ii. Between 100 and 111 beds
    b. Renovation of the houses at 112 and 114 Wentworth
        i. VERY small project, with only a few dozen beds
    c. 13 Coming/8 Kirkland
        i. Slightly larger than the 112/114 Wentworth project, but not by much



4. ***Mt. Pleasant Days Inn***
    a. Explored acquisition of the old Days Inn at 261 Johnnie Dodds Blvd in Mt. Pleasant.
    b. The facility was owned by VTT Management and had 130 rooms.
    c. The site was about 2.5 acres
    d. The seller was not willing to work through the state process, and the College could not act quickly enough.
    e. There were questions about how well student housing of the peninsula would be received by students.



5. ***Master Lease Existing Student Housing in Charleston***
    a. Issued an RFP in September 2021
        i. Only two responses – 99 St. Philip, 61 Vandy
        ii. CofC moved forward with 99 St. Philip as 61 Vandy became unresponsive due to lease timeline
    b. Issued an RFP in April 2022
        i. Warren Place lease was ending August 2023
        ii. Only two responses – Warren Place, 930 NoMo
        iii. CofC moved forward with Warren Place as 930 NoMo was cost prohibitive and the College had existing infrastructure at Warren Place so remaining in place saved College resources
    c. Issued an RFP in June 2023
        i. Only a few responses – 61 Vandy, 930 NoMo, 595 King-Hofler Place, 363-369 King
        ii. CofC moved forward with 61 Vandy as the others were far too expensive.
            1. The lease rates were well above our existing housing fee structure.
    d. Issued an RFP in April 2024
        i. Only one response – 930 NoMo
        ii. CofC didn't move forward with accepting proposal as it was higher than their previous proposal and well beyond our student housing rate.

6. ***200 Meeting***
    a. Looked at acquisition of the building and parking deck at 200 Meeting Street
    b. 4-story, 145K heated square foot building offered by Avison Young
    c. Needed extensive renovation to make residential.
    d. The seller was not willing to work through the state process, and the College could not act quickly enough.



7. ***Wentworth/St. Philip Street Parking Deck***
    a. The College does not own the land.
    b. City of Charleston is going to require at least the current number of parking spaces (503) return in the new development, which leaves very little space for other uses.

8. ***220 King Street***
    a. Acquisition of the former nunnery and Christian bookstore at the corner of Beaufain and King streets
    b. Had limited housing units already built out, but needed significant work
    c. Did not offer much in the way of density
    d. Seller moved to another buyer that could work faster than a State agency

9. ***Redevelopment of College Lodge site***
    a. Initial plan was to replace facility with new residence hall
    b. After a feasibility study, it was determined that the footprint is not large enough to provide necessary density

10. ***Residence Inn on Ripley Point***
    a. Temporary solution to housing needs
    b. Cons: too expensive, requires transportation support to main campus

As an additional analysis of harm avoidance, the College along with its consultants have analyzed construction methods, design considerations, engineering and building code, and local ordinance requirements when considering new construction for the site. Two main requirements below outline unavoidable ground disturbance impacts for any new construction activity:

- Soils and bedrock, Cooper marl, located in the Charleston peninsula require significant structural foundations to meet engineering and seismic zone requirements. The impact to a site's footprint for building foundations can range from 50'-80' below grade for piles with caps being multiple feet deep and 10'-20' square pile caps impacting on average 5' below grade and above the water table.
- The City of Charleston's Stormwater Design Standards will require any new construction to provide stormwater retainage vaults to offset new construction and impervious area runoff. In-ground vaults require extensive ground disturbance sitting below finished floor and above the site's water table, likely 5'0" below site grade.

Through consultant analysis and regulatory review, it has been determined that complete preservation in place (i.e., true harm avoidance) is not feasible where development of substantial scale is proposed. Structural engineering requirements, stormwater management constraints, subsurface conditions, and required building foundations would unavoidably disturb archaeological deposits and burial features. As a result, the Work Plans are framed around mitigation and stewardship, rather than avoidance.
Accordingly, the project's proposed approach emphasizes:

- Careful archaeological investigation and documentation,
- Respectful treatment and reinterment of human remains where encountered, and
- Development of memorialization and commemoration informed by regulatory review and community engagement.

The College further notes that if it is ultimately determined that a residence hall cannot be constructed at this site, the College will not proceed with development and the property would be sold under its existing entitlement and zoning requirements.

APPENDIX B: SITE WORKER INFORMATIONAL PAMPHLET

WHY THIS SITE MATTERS

Charleston's City Cemetery, also called the Public or Strangers Burial Ground, operated from 1794 to 1807 as the primary burial place for individuals who lacked access to church or private cemeteries, including the poor, the sick, orphans, enslaved people, free people of color, and foreign travelers. By 1807, the burial ground was declared full and closed. Shortly thereafter, the land was leased and sold for development, resulting in dense residential construction atop the cemetery.

Please remember that the area you are working in is a culturally sensitive area that may contain important archaeological resources, including the remains of historic structures dating from the early 1800s, cultural features, and even unmarked burials. Protecting them is not only respectful—it is required by law.

SOUTH CAROLINA LAW

SC Code §16-11-600, entering property after a "No Trespassing" notice has been posted or personally communicated constitutes a misdemeanor, punishable by a fine of up to $100 and/or imprisonment for up to 30 days.

SC Code § 16-11-780 makes it unlawful to knowingly enter private or posted state lands to excavate, disturb, or remove archaeological resources (material remains at least 100 years old). Violations carry escalating penalties from misdemeanor to felony charges punishable by up to $5,000 and five years' imprisonment, along with potential equipment forfeiture and civil liability.

Pursuant to SC Code §16-17-600, it is a felony to knowingly and willfully disturb, damage, desecrate, or remove human remains, burials, or associated grave markers without proper legal authority. Violations are subject to penalties of up to 10 years' imprisonment and/or fines up to $5,000.

WHAT TO LOOK OUT FOR

Burials may have been impacted during historical development, and they may be displaced from the burial location. Be observant for possible bones, artifacts, or odd soil stains, particularly stains with straight lines or stains that are unnatural looking.

- Possible human remains (bone fragments, teeth, organized bone layouts).
- Burial features (soil stains, coffin hardware, concentrations of shell)
- Cultural features (brick or stone alignments/concentrations, hearths/charred wood, postholes, refuse pits, dark stains)
- Artifacts (jewelry, buttons, clothing accessories, tools, glass, ceramics, metal items, arrowheads, Native American pottery, etc.)

WHAT TO DO IF YOU ENCOUNTER SOMETHING?

- Stop all work in the area.
- DO NOT touch or move anything!
- Notify the archaeological monitor immediately.
- Await archaeological evaluation and next steps.

If human remains are encountered, an on-site archaeologist will initiate the *Unexpected Discoveries* process, which involves contacting the County Coroner to determine if the remains are archaeological or not. Work cannot continue until the archaeological monitor gives the "all clear".

APPENDIX C: COMMUNITY ENGAGEMENT COUNCIL

Subject: Selection to the Community Engagement Council (College of Charleston)
Date:
From: Andrew T. Hsu
To:
BCC: Berry, Mark E

Dear XXXXX,

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

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

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

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

We look forward to your involvement and meaningful work ahead.

Sincerely,

Andrew

Andrew T. Hsu, Ph.D.
President

COMMUNITY ENGAGEMENT COUNCIL

Facilitators

Joanna Gilmore - Anson Street African Burial Ground
LaSheia Oubre - Anson Street African Burial Ground
Clay Middleton

Community Members				Liaison	Consultants	Advisors
Harlan Greene	**Jim Newhard**	**Walter B. Brown**	**Joshua Shumak**	**Dr. Courtney Howard,** VP of Community Engagement	**Dr. Tonya Matthews** IAAM	**Arthur McFarland Retired** municipal judge
Lisa Jones	**Jalen Evans**	**Stephen Vale Cofer-Shabica**	**Abigail Dairaghi**		**Michael Allen** National Parks Service	**Demetria Noisette Clemons** Trustee Emerita
Jerome Harris	**Zoe Barber**	**Patricia Ploehn**	**Julie Ann Bowling**			**Omar Muhammad** Protect & Respect the Bodies
Madison Lee	**Sharon Ramirez**	**Dr. Millicent Brown**	**Eric Manning**			
Dr. Shawn Gathers	**Norm Dickerson**	**James Njonjo**	**Luqman Rasheed**			

Community Engagement Council

Mission, Objectives, Goals and Values

During the Community Engagement Council (CEC) Meeting on November 12, 2025, Council members shared their ideas for the mission, objectives, goals, and values for the Council. Using these ideas, the following definitions and priorities were created. See the Appendix (below) for the full details of Council members' responses or this spreadsheet.

Mission

The mission of the Community Engagement Council is to **advise** the College of Charleston on the proposed Coming Street residential project to ensure that the people buried there are cared for in a way that **respects, honors, and celebrates** their **humanity, cultures, and lives**.

Guided by **sensitivity, respect, and humility**, the Council provides an **open and transparent forum** for community voices, working to **center narratives and histories that have been hidden or buried**.

Together, we strive to *use this project as an opportunity to right harms of the past and avoid future harm by* creating **honorable, humanity-centered pathways of stewardship, repair, and partnership** between the College, collective descendants, and the broader Charleston community.

Through **truth-telling, accountability, and collaboration**, we seek to model a process that leads toward **conciliation, justice, and healing,** ensuring that known cemeteries on College of Charleston property are not disturbed without descendant approval.

Objectives

1. **Lead with honesty, empathy, and humility**, ensuring that all perspectives are heard and respected.
2. **Model a new standard of community collaboration**, grounded in transparency and trust.

3. **Provide open forums for dialogue and feedback**, creating visible, tangible outcomes that reflect community priorities.
4. **Advise on research, preservation, and commemorative stewardship** of the burial ground, the 19th-20th-century community, YWCA, and any associated artifacts and materials, ensuring that descendant and community values guide all actions.
5. **Advise whether in-situ preservation would be the most reverent** and **ethical** approach to honor and memorialize the deceased
6. **Document and share** the full history of the public burial ground and historical community.
7. **Encourage education, learning, and truth-telling**, both within the College and across Charleston, as part of a broader process of healing and repair.

Goals

1. **Honor and memorialize the ancestors** with dignity and care, restoring their personhood and sacred presence.
2. **Ensure truth and transparency** in all communications and decision-making about the burial ground.
3. **Foster trust and lasting collaboration** between the College, descendant community, and Charleston residents.
4. **Create meaningful spaces for remembrance and reflection** through memorial design, ceremony and interpretation of the full history of the public burial ground and historical community.
5. **Support education and dialogue** that deepen understanding of African, Indigenous, and other cultural traditions connected to the public burial ground and historical community.
6. **Direct involvement** in developing plans for the study of the remains and cultural artifacts identified at the site if excavation is deemed unavoidable.
7. **Seek solutions** that prioritize respect for the burial ground's sacred nature while considering community and institutional needs.
8. *(Stretch Goal)* **Inspire connected conversations citywide** that protect other sacred sites and advance sustainable community engagement.

Value Statements

- We honor and protect the dignity of both the living and the dead.
- We listen with empathy, learn with humility, and lead with love and grace.
- We commit to honesty, transparency, and working at the speed of trust.
- We collaborate across differences, share decisions, and communicate openly.
- We make space for all ideas, seek common ground, and nurture creativity and openness.
- We are mindful of our voice, posture, and energy as we work together to acknowledge past harms and build a more respectful, caring future.

Appendix: Summary of CEC Meeting Feedback on the Mission

Council members consistently emphasized that the mission of the Community Engagement Council should be rooted in respect, transparency, truth-telling, and repair.

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1. Honoring and Preserving the Sacred Site

Councillors emphasized the sacred responsibility to care for the burial ground and to honor the humanity of those interred there.

> *"Honor those buried and preserve the grounds with community support."*
> *"Ensure the College of Charleston Coming Street site respects, honors, and celebrates the people who are interred there by honoring their humanity, culture, and lives."*

---

2. Centering Community and Descendant Voices

There was strong agreement that this process must not be college-driven but community-led, and that the Council should create a model of shared decision-making.

> *"Clarify publicly and widely the process of collaboration being attempted… not a college-driven task."*
> *"Provide an open and transparent forum that leads to a deeper understanding of the entire community's needs."*
> *"A community-based collaborative organization to bring about a nationally recognized process of engagement."*

---

3. Truth-Telling and Accountability

Members called for open acknowledgment of past wrongs, especially regarding how the property was acquired, and for clear systems to prevent similar harm in the future.

> *"A thorough and transparent report that clearly lays out all decisions, and the decision makers involved… and preventative measures that will stop something like this from ever happening again."*
> *"Centering narratives and histories that this College and city has hidden and buried."*

---

4. Healing, Stewardship, and Repair

The Council's work was described as a moral and relational endeavor - one that should model conciliation, justice, and care for future generations.

> *"To create honorable, humanity-centered stewardship, repair, and partnership pathways for CofC and Charleston communities, modern and descendant."*
> *"Resolve this issue with knowledge of the past and create pathways others could follow in future."*
> *"Bring forth processes that lead towards conciliation, justice, and truth-telling."*

Summary of CEC Feedback on Objectives

Objectives describe the *specific actions or intentions* that move us toward our mission.

Council members envisioned the Council as a model for ethical collaboration and public accountability, one that leads with empathy, listens deeply, and acts with integrity:

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1. Acting with Honesty, Empathy, and Respect

Councillors repeatedly emphasized *how* the Council should work. They suggested that we lead with humanity, listening to all perspectives, and honoring the cultural and spiritual traditions of those buried at the site.

> *"To lead with honesty and empathy."*
> *"Listen to all perspectives."*
> *"Intentionally honor, engage, and include the multitude of cultural and religious traditions of those who are buried there."*
> *"Honoring those lives who were not considered and not valued with intentional purpose."*

These statements reflect the group's shared desire to make integrity and care foundational to every action the Council takes.

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2. Building a Model of Transparent, Inclusive Collaboration

Members described a vision for the Council as an example of how institutions and communities can work together more equitably - not just in Charleston, but nationally.

> *“To help set a new standard of community collaboration within Charleston and this country.”*
> *“Ideas brought forth by this council are implemented in meaningful, tangible ways.”*
> *“To produce recommendations for the ComMons project to be publicly acted on by the College of Charleston administration and trustees.”*
> *“Offer a space for students and locals to ask questions or offer feedback.”*

These objectives capture both the *process* (open collaboration) and the *product* (visible, public outcomes) that participants want the Council to embody.

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3. Research, Documentation, and Commemoration

A third objective theme centers on the Council’s role in helping shape the research, stewardship, and commemoration of the site, ensuring that actions are informed, respectful, and community-guided.

> *“To map out a plan for commemorative stewardship of the site and any remains or artifacts discovered.”*
> *“To consult and advise on all aspects of the historical, archaeological, and interpretive elements for all periods represented.”*
> *“To research, document, and preserve the stories of those who were marginalized.”*
> *“To seek opportunities for education and learning about the people who were interred there.”*

These reflect practical objectives within the Council’s advisory scope - to guide, review, and advise on key elements of interpretation, research, and memorialization.

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4. Truth-Telling and Learning

Participants urged the Council to document and share the full history of the site.

> *“Understand in detail how we arrived at this place.”*
> *“We all learn from this experience so that it does not repeat itself.”*
> *“The College takes this as an opportunity to learn more about 106 Coming Street and other sites on campus where community collaboration may not have been present.”*

> *“Find a solution that prevents erasure, that is community and descendant led and demonstrates the importance of our city's sacred sites.”*

This reflects a commitment to *learning through accountability*, through this process we can honor the past while guiding future action.

Summary of CEC Feedback on Goals

Goals describe the broader outcomes that the Council hopes to achieve over time. They express the council members’ long-term vision and values.

While objectives are the concrete steps we can take now, goals point toward the future we want to create together.

1. Honoring and Memorializing the Ancestors

The strongest theme was the desire to honor those buried at 106 Coming Street through memorials, rituals, and remembrance that restore dignity and personhood.

> *“Honor and memorialize the ancestors who perished.”*
> *“To protect, respect and honor those resting under 106 Coming.”*
> *“To restore personhood to the ancestors.”*
> *“To create a space that is respectful of those interred at the site.”*

---

2. Truth, Transparency, and Accountability

Members called for honesty from the College and the city about what happened, how decisions are made, and how information is shared.

> *“Transparency – honesty from CofC about this project, why? when? how?”*
> *“All pending government oversight approval are made public.”*
> *“To have the city recognize its responsibility.”*

---

3. Shared Decision-Making and Collaboration

Participants emphasized collaboration between the College, community, and descendants in all decisions that affect the site.

“To create a process for shared decision-making.”
“Collaboration within our communities.”
“To work together to use this project as an opportunity to right the harms of the past.”

---

4. Learning and Education

Many saw the burial ground as a place of ongoing learning, where history, faith, and cultural traditions can be studied and taught.

“Learn more about the past.”
“Studies of African/Indigenous customs.”
“Proper community understanding of the Islamic religion and our way of life.”
“To develop and create meaningful dialogue.”

---

5. Commemoration and Place-Making

Participants spoke of creating public spaces that both honor the ancestors and serve as places for reflection, healing, and community gathering.

“Create a proper public memorial to the persons buried at 106 Coming.”
“To appropriately and adequately memorialize the burial site and distinguish between the purpose of its memorial vs. the YWCA.”

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6. Balancing Housing and Sacred Ground

Several members acknowledged the tension between the College’s housing needs and the sacred nature of the burial ground, calling for solutions that respect both.

“Create a strategy that addresses housing needs, the sacred nature of the site, and community needs.”
“Find a way to honor and respect those buried while helping meet housing needs.”
“A shift away from the need for housing towards rigorous and contemplative study.”

Summary of CEC Feedback on Values

Values express *who* we are and *how* we choose to work together. They guide our behavior, shape our relationships, and ground our decisions in respect, care, and accountability.

Here's a brief summary of the Anson Street African Burial Ground Team Ethos:

Our ethos begins with humility and honesty. We recognize our different positions and power, and we work to center the voices of those who have been silenced or marginalized.

We believe that descendant communities should guide decisions about ancestral remains, sacred places, and cultural heritage.

We commit to building relationships based on trust, respect, and mutual care, staying mindful of who benefits from this work and striving always to increase those benefits.

Our work should be rigorous and responsible, but also human - grounded in dignity, empathy, and integrity.

And finally, we try to act in ways that are socially, culturally, and economically sustainable, supporting local communities, especially Black-owned businesses and organizations.

Building on the values established by the ASABG team, the Council reaffirms the following principles. These principles remind us that the process of this work is as important as the outcomes - honoring "*this is a process not a moment*.".

1. Respect for Lived Experience and Human Dignity

Council members affirmed that every person's story and experience matter and that honoring both the living and the dead must be central to this work.

> *"We do not argue with lived experiences."*
> *"We work to honor, protect, and nurture the dignity of the living and the dead."*
> *"Honor human dignity."*

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2. Listening, Learning, and Grace

Listening with empathy and humility was seen as the foundation for trust and understanding. Members also emphasized granting grace - to colleagues, to those with opposing views, and to themselves.

“Prioritize listening and learning.”
“Listen to concerns from every angle with the intention of understanding.”
“We grant grace to our colleagues, to our contradictors, and to ourselves.”
“To listen, to learn, and to lead with love.”

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3. Trust, Transparency, and Honesty

Transparency and honesty were identified as essential for building and maintaining community trust.

“Work at the speed of trust.”
“Open data.”

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4. Collaboration and Shared Decision-Making

Members highlighted collaboration across differences, within the Council, with the College, and with other partners, and emphasized shared leadership and open communication.

“Shared decision-making.”
“Work across our differences.”
“Collaboration and communication with university and contractors, state and local agencies.”
“Building consensus when possible.”

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5. Creativity, Openness, and Common Ground

Creativity, flexibility, and the willingness to find common ground were seen as vital to sustaining this work over time.

“Being creative and open-minded.”
“Make space for all ideas.”
“Where there are differences, try to find common ground.”

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6. Mindfulness and Care in Process

Participants noted the importance of being mindful of tone, energy, and approach in every interaction.

“We are mindful of voice, posture, and energy—our own and our neighbor’s.”
“Acknowledge past harms.”
“Work at the speed of trust.”

APPENDIX D: 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. **15 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 -SWPPP and Site Security Plan	**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 -Pre-Geophysical meeting with SHPO	-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.

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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.
Monthly Informational Exchange Packet	A recurring submission from the College of Charleston to SHPO providing ongoing project updates and information sharing, including summaries of Community Engagement Council (CEC) discussions, stakeholder input, and project developments. The Exchange Packet supports transparency and keeps SHPO apprised of engagement outcomes and evolving project conditions, while formal recommendations are transmitted separately through Work Plan amendments submitted by the College for review, comment, and approval.
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.

PROJECT 205 - PROCEDURAL SUMMARY LEGEND

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.
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.

PROJECT 205 - PROCEDURAL SUMMARY LEGEND

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.

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APPENDIX E: COLLEGE OF CHARLESTON COMMITMENT LETTER

COLLEGE OF CHARLESTON

Andrew T. Hsu, Ph.D.
President

December 17, 2025

Dear South Carolina State Historic Preservation Office,

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

- The consultants team will use the College of Charleston Libraries (which includes the Avery Research Center for African American History and Culture) as its primary repository for all findings and documentations related to the project. The CofC Libraries will also hold all future produced internal scholarship (both from faculty and students); these research documents will be shared with SHPO for their records.

- The College's consultants team will provide monthly updates, with benchmark reports/findings (Stages 1 & 2), as well as weekly reports during active archaeology (Stage 3). These updates will include, but are not limited to, all Community Engagement Council meeting minutes, website updates, City of Charleston Council engagements, tribal communications, YWCA Executive Committee communications, Charleston Board of Architectural Review communications and larger community meetings.

- Thus far, the College's project team has worked closely with the YWCA Executive Committee, with individual meetings in spring 2025 (April and May) and inclusion in the three subsequent Community Engagement Meetings, coordinated by the Asiko Group (June, August and September 2025). In the September 2025 meeting, the YWCA leadership had a table, sharing information about their past and current programs. The YWCA leadership will be instrumental in future

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

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

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

Sincerely,



Andrew T. Hsu

APPENDIX F: COLLEGE OF CHARLESTON ACHP POLICY OUTLINE

College of Charleston

Project 205 – Coming Street Commons

Addressing:

ACHP - Policy Statement on Burial Sites, Human Remains, and Funerary Objects (2023)

The College recognizes that the expanded understanding of the burial ground has introduced significant ethical, cultural, and practical considerations that were not fully understood at the time of acquisition. As a result, the College has evaluated a range of possible paths forward, including private sale, non-development, and student residence development. Each option presents substantial trade-offs in terms of stewardship, community influence, financial feasibility, and long-term care.

At this stage, given existing ownership, zoning, and the absence of a viable acquisition or funding pathway for non-development alternatives, the College is focusing on how to ensure that any actions taken reflect the highest possible standards of care, transparency, and community engagement. This includes ongoing consultation and the incorporation of Community Engagement Council advice into archaeological planning, human remains handling and treatment decisions, and memorialization.

Although Project 205 is not a federal undertaking, and the burial ground currently lacks sufficient information for a determination of eligibility under Criterion D of the National Register of Historic Places pursuant to the Secretary of the Interior's Standards as administered by the South Carolina State Historic Preservation Office (SC SHPO), the College of Charleston is committed to exercising a high standard of stewardship. To that end, the College will utilize the Advisory Council on Historic Preservation's (ACHP) guiding Principles to inform the project. This outline begins to address CEC concerns related to Principles 1–3, with the understanding that these commitments may evolve and be further refined and expanded to encompass all thirteen Principles over time.

In alignment with **Principle 1**, which requires that burial sites, human remains, and funerary objects be treated with dignity and respect in all circumstances regardless of National Register eligibility or project context, the College is committed to:

- Ensuring respectful treatment in every phase of work, including the removal and reinternment of any human remains found, guided by the Archaeological Work Plans, which incorporate South Carolina archaeology standards, nationally recognized protocols, and methodologies for the handling, documentation, and protection of burial sites, human remains, associated features, and funerary objects.
- Based on current structural, engineering, and regulatory requirements, avoidance and minimization present significant challenges. The College continues to evaluate these constraints alongside community input and evolving project information.
- Prioritizing meaningful, ongoing consultation with descendant communities, facilitated in part through the Community Engagement Council (CEC) and additional public-facing processes,

including Community Outreach Forums corresponding with Work Plan stoppages, updates on project website, and future collaborative discussions to ensure that handling and treatment practices, blessing or ceremonial activities, interpretation, and any culturally significant considerations are informed by community perspectives and reflect dignity and respect in all interactions.

In alignment with **Principle 2**, which emphasizes avoiding disturbance to burial sites whenever practicable and requiring a transparent, well-documented alternatives analysis when avoidance is not feasible, the College notes the following:

- The College has conducted an extensive review of potential alternative locations over the past ten years. The College acknowledges ongoing requests for additional detail regarding this analysis and is working to provide further clarification of the methodology and comparative considerations used to assess feasibility. Methods being considered for further clarification:
    - Construction Feasibility Methodology and considerations
    - Archaeology Feasibility Methodology: costs and timelines may vary depending on findings and a range of scenarios. This will be considered internally to balance cost vs time without sacrificing care and quality.
    - Costing Category Distinctions: construction, archaeology, reinternment, memorialization, and commemoration
- During the College's ten-year review and study of potential alternative locations for the needed residence hall it was determined that, given Charleston's constrained peninsula geography and current market conditions, only one other undeveloped parcel of comparable size (~2 acres) exists; this parcel is now under private development, leaving no feasible alternative within proximity of the College's main campus. Additionally, Charleston's historic building stock, zoning restrictions, and building-code requirements for new collegiate residential facilities make adaptive reuse or infill alternatives impracticable for a viable project with the required density needed. Given the current conditions, including land ownership, zoning, and lack of feasible acquisition alternatives, the College believes that the project allows for the highest level of stewardship, transparency, and community input.
- Engaging in ongoing, descendant-centered consultation in part through the Community Engagement Council (CEC), which serves as the primary forum for treatment methods, ceremonial considerations, reinterment preferences, and commemoration priorities. Along with providing public-facing transparency through the project website, community updates, and Community Outreach Forums corresponding with Work Plan stoppages to solicit broader community feedback and discussions of project updates.
- Determinations by the consulting AEs confirmed that preservation in place is not viable due to the structural engineering requirements of a multi-story building, Storm Water requirements, and subsurface conditions that are incompatible with leaving the burial ground undisturbed. In addition, the SC SHPO concluded that insufficient information currently exists to support National Register eligibility under Criterion D, and that the burial ground is not eligible under Criterion A. Despite the lack of regulatory triggers, the College remains committed to

institutional stewardship by applying the ACHP's policy framework. In alignment with Principle 2, the College seeks to advance a mitigation strategy that reflects the ACHP's expectations when avoidance is not feasible, including development of a comprehensive memorialization plan and the creation of a historical repository for archaeological and cultural findings.

In alignment with **Principle 3**, which emphasizes early, inclusive, and culturally informed consultation with descendant or associated communities, even when no definitive descendant group can be identified, the College is committed to:

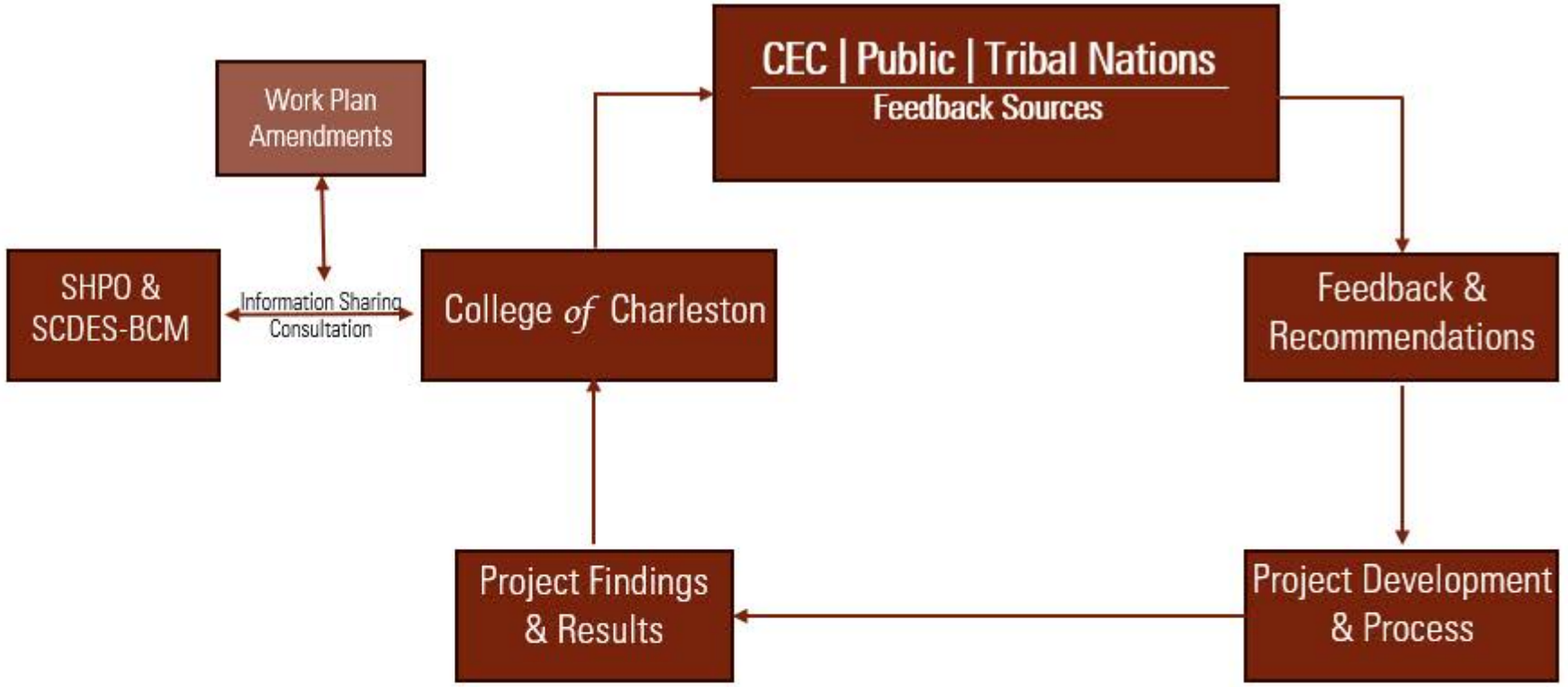
- Acknowledging that no lineal descendants have been formally identified through archival records to date; however, the College recognizes and welcomes engagement from individuals and communities who identify cultural or ancestral connections to the site.
- The College recognizes that consultation is an ongoing process and that community members, including CEC participants, have expressed the need for earlier and more direct opportunities to provide input prior to key project submissions. In response, the College is working to incorporate additional opportunities for review and feedback as part of an iterative engagement process and established Information Sharing and Feedback Loop.
- The Community Engagement Council (CEC) is made up of community members with demonstrated care and cultural interest in the burial ground. While the CEC is not a replacement for the broader descendant communities or communities of care, the CEC serves as a self-nominated representative advisory body to guide respectful treatment, provide input on culturally-sensitive practices, and help shape commemoration. The CEC is one component of a broader and evolving approach to engagement with descendants and communities of care.
- Not only are the CEC meetings open to the public to promote transparency, but the College established a public-facing project website to share updates and information openly. Throughout the project's trajectory, future Community Outreach Forums will be held to ensure two-way communication and opportunities for community feedback, and questions to occur. Acknowledging community concerns that "information is not consent," and ensuring that engagement is not treated as approval, the College seeks to establish and maintain ongoing dialogue.
- In conducting good-faith outreach to 13 Tribal Nations with South Carolina connections, the College provided background materials about the burial ground, explained the potential for encountering historic remains, and invited any Tribal Nation with ancestral ties to share documentation, cultural information, or guidance on procedures they would want followed should identifiable Native American remains be discovered. No deadlines were imposed in the request for response to respect differing tribal capacities and timelines. To date, the College has received responses from two, while continuing to keep communication channels open for additional input.
- CofC administration will commit to sharing work plans (via email attachments and the Google Drive) when they are submitted to state agencies, for discussion and recommendations from the CEC. If adopted, the recommendations will be added as amendments that will be appended to the work plans.

- CEC Recommendations and Lines of Action can be followed in this document: https://docs.google.com/spreadsheets/d/1exP6-HTPqZIIbyeJtYOKGwEsNZx8BNLJvXeaS2TAQyo/edit?usp=sharing

While Section 106 is not applicable to Project 205 due to no federal undertaking, and no nexus has initiated NAGPRA protocols, the College may be informed by ACHP Principle 3 to support culturally informed, respectful treatment decisions and meaningful consultation. The College recognizes that no definitive descendant group can be identified due to the lack of surviving historic burial records and the SC SHPO finding that the cemetery does not meet Criterion A and lacks sufficient information for a Criterion D determination. Even so, the College is proceeding with a stewardship-based approach in which all archaeological, interpretive, and commemorative decisions are informed by inclusive community and Tribal engagement. This includes working in accordance with South Carolina archaeological standards and nationally recognized best practices for cemetery investigations, creating opportunities for affiliated and interested communities to provide input on the respectful handling, documentation, and reinterment of any remains, and acknowledging community feedback that "information is not consent." The College has also incorporated public transparency through open CEC meetings, a dedicated project website, and will continue this dialogue through future Community Outreach Forums. These measures, working in tandem to help ensure that treatment actions, such as documentation choices, ceremonial practices, and cultural protocols, reflect the values and perspectives of those with cultural, historical, or community ties to the site, even in the absence of formal regulatory triggers.

APPENDIX G: INFORMATION SHARING AND FEEDBACK LOOP

INFORMATION SHARING & FEEDBACK LOOP



Project **Feedback Sources** include different stakeholders from the public, community of care, descendant communities, and the Community Engagement Council (CEC). These entities' **feedback and recommendations** will guide and inform the project development and process in ethical treatment, commemoration, and memorialization. The Work Plans establish the framework for the methodology, technical procedures, and legal requirements that the project will be conducted under to document and relay **project findings and results**. Project findings and results will be shared by the **College of Charleston**, in consultation, with **SC State Historic Preservation Office** (SHPO) to determine if formal **Work Plan Amendments** are adopted and approved to address feedback recommendations, project development, and findings. The College will maintain the information sharing and feedback loop through the CEC, Project website, and Community Outreach Forum events, along with any individual or group stakeholders that may arise over the course of the project.

Different stakeholders play distinct roles in the process, including regulatory authority, consultation, and advisory input. Participation in information sharing or feedback processes does not constitute consent.

APPENDIX H: TRIBAL OUTREACH AND NAGPRA

College of Charleston

Project 205 – Coming Street Commons

Tribal Outreach & NAGPRA

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

In the event the Native American Graves Protection and Repatriation Act (NAGPRA) is triggered due to encountering identifiable Native American human remains, lines of communication will be open. The Accessible Test – Steps 1 through 8 for Repatriation of human remains or associated funerary objects from the National NAGPRA Program can be found following this introduction. Formal Consultation with the tribes has not yet occurred, so these protocols are not included in this draft of the work plan. Any protocols established will be at the discretion of the Tribes for release or inclusion into the project public record in accordance with their standards.

In addition, the College has reached out to the following agencies for resources and information concerning applicable laws and regulations:

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

The College of Charleston has undertaken good-faith outreach and engagement with Federally recognized Tribal Nations with historical and ancestral connections to South Carolina and the project area. To date, project notification letters have been sent to thirteen (13) Tribal Nations, providing background information on Project 205, the site history, and the potential for encountering archaeological materials and human remains, and inviting dialogue regarding culturally appropriate protocols and procedures. An example letter can be found following this introduction.

As part of this engagement, the College has held a one-on-one consultation meeting with representatives of the Muscogee (Creek) Nation, during which project background, anticipated investigative approaches, and project considerations were discussed. In

addition, the Catawba Indian Nation has requested a one-on-one meeting, and the College has responded affirmatively and is currently awaiting further direction regarding scheduling and preferred format.

The College remains committed to maintaining open lines of communication with Tribal Nations throughout the project and recognizes that consultation timelines and participation vary among Tribes. No response deadlines have been imposed. Continued outreach, information sharing, and opportunities for consultation will occur as the project progresses and as additional information becomes available through staged archaeological investigations.

Repatriation of human remains or associated funerary objects

Step 1: **Compile an itemized list.**	**Step 2:** **Initiate consultation.**	**Step 3:** **Consult.**	**Step 4:** **Complete an inventory.**
• The number of individuals and associated funerary objects • The geographical location • The acquisition history • Other information to identify lineal descendants or cultural affiliation • Presence of any hazardous substance treatment	• Any lineal descendant • Any Indian Tribe or NHO with potential cultural affiliation • Include itemized list, names of all consulting parties, and proposed timeline and method for consultation	• Respond to any consulting party • Address identification of lineal descendants, Indian Tribes or NHOs with cultural affiliation, types of associated funerary objects, and duty of care • Make a record of consultation	• Consulting parties and dates • Itemized list, updated • For each entry, a determination: • Lineal descendant • Clearly identified cultural affiliation • Reasonably identified cultural affiliation • None of the above **! Send to consulting parties and National NAGPRA !**
43 CFR 10.10(a)	43 CFR 10.10(b)	43 CFR 10.10(c)	43 CFR 10.10(d)(1)

Six months after Step 4 **Step 5:** **Submit a Notice.**	**Any time after Step 5** **Step 6:** **Receive and consider requests.**	**90 days after Step 6** **Step 7:** **Respond to requests.**	**90 days after Step 7** **Step 8:** **Repatriation.**
• Abstract of information in itemized list • Determination in inventory • Total number of individuals associated funerary objects • Contact information to submit requests **! Send to consulting parties and National NAGPRA !**	• Joint request is a single request • Criteria for a request is EITHER: • Requestor is identified in the notice OR • Requestor shows lineal descent or cultural affiliation - preponderance of the evidence	• Written response to requestor and any other party in notice • ONE of following: • Meets the criteria • Does not meet the criteria and request more information • Competing requests received	• Written statement relinquishes possession or control to requestor(s) • After statement, consult on and document physical transfer and protect sensitive information **! Send to requestor(s) and National NAGPRA !**
43 CFR 10.10(e)	43 CFR 10.10(f)	43 CFR 10.10(g)	43 CFR 10.10(h)

Accessible Text – Steps 1 through 8

EXAMPLE TRIBAL CORRESPONDANCE

January 28, 2026

College of Charleston
66 George Street
Charleston, SC 29424

XXXX
XXXX
XXXX
XXXX
XXXX
XXXX

Re: College of Charleston's Proposed Student Residence Hall, 106 Coming Street, Charleston, South Carolina

Dear XXXX,

The College of Charleston is a public university, situated at 66 George Street, Charleston, South Carolina. Considered the oldest institution of higher education in South Carolina, the College was founded in 1770 and chartered in 1785. Presently, the College of Charleston proposes to construct a 1,000-bed planned student residence hall, Coming Street Commons, also known as Project 205, 106 Coming Street and/or 99 St. Philip, or the College of Charleston St. Philip Housing Development.

The College is an institution of higher education of the State, authorized by the Higher Education Act to issue higher education facilities revenue bonds for the purpose of financing or refinancing in whole or in part the cost of acquisition, construction, reconstruction, renovation and improvement of land, buildings, and other improvements to real property constituting Higher Education Facilities under the General Bond Resolution and the Higher Education Act. **No federal funding is anticipated as part of this project.**

The project requires a National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit and a Coastal Zone Consistency (CZC) Certification. The Clean Water Act (CWA) created the NPDES program, and the US Environmental Protection Agency (EPA) has delegated the authority of issuing NPDES permits to the states. As such, the states are empowered to administer their own permitting program, as long as it complies with the requirements of the NPDES permit. Thus, **State-issued NPDES permits are not considered a federal undertaking.** In South Carolina, the Department of Environmental Services (DES) issues and manages NPDES permits. The DES' Bureau of Coastal Management (BCM) issues the CZC certificates as part of the permitting process for ground disturbance in the coastal zone areas of South Carolina.

The College's land holdings are state-controlled. The project location is bordered by Vanderhorst (north), St. Philip (east), Calhoun (south), and Coming (west) streets (**Attachments 1 and 2**). It encompasses the location of the former one-story Young Women's Christian Association (YWCA) of Greater Charleston building and a Potter's Field (Public Burial Ground B).

The YWCA originally operated out of a private residence at 106 Coming Street between 1911 and 1963. The house was demolished in 1963 and 1964, with the current building being constructed in 1965; it remained in operation through 2014. The YWCA at Coming Street served African American women, while a second YWCA located on George Street served the white community. The Coming Street YWCA played an important role in the local Civil Rights movement of the 1960s; for instance, several of the YWCA Board and members participated in the 1969 Charleston Hospital Strike. The City of Charleston's Board of Architectural Review approved demolition of the building, which will be recorded through Historic American Building Survey (HABS) documentation for submittal to the South Carolina Department of Archives and History, Historic Preservation Department's State Historic Preservation Office (SHPO). A copy of the report summarizing this resource is provided in **Attachment 3**.

The Potter's Field is also known as Public Burial Ground B (See **Attachment 2**). The cemetery was used for burials from 1793 to 1807, which includes burials linked to the trans-Atlantic slave trade. In 1817, the City subdivided the land into 11 lots, which were leased for residential development; the property was formally sold in the 1840s. The cemetery was used for interment of free white persons, strangers, foreigners, slaves, and people of color. Historically in some census records, Native Americans were enumerated as "all other free persons." The proximity of the Orphan House, the Poor House, and City Hospital to the cemetery also suggests children of unknown ethnicities might be interred in the public cemetery (See **Attachment 2**). The cemetery has not been formally evaluated. A copy of the report summarizing the cemetery is provided in **Attachment 3**.

In 2014, a private developer (McAlister Development Group) purchased the YWCA to develop a high-density student housing complex. The Charleston City Council approved the site for high-density student housing in 2023. In 2025, the College of Charleston acquired 1.14 acres of land which overlays approximately one-third of the original boundary of the cemetery and includes the YWCA building. At the time of the purchase, the land was appraised at $75.8 million for two parcels (106 Coming and 99 St. Philip streets). The College is committed to honoring the full and complex history of the property by thoughtfully incorporating two permanent commemoration sites into its footprint. These sites will recognize the legacy of the YWCA, whose presence on the property reflects a history of community service, advocacy and support, as well as the Potter's Field, which serves as a solemn reminder of those who were laid to rest there and whose lives deserve remembrance and dignity. By embedding these commemorative spaces into the landscape of the property, the College affirms its responsibility to preserve historical memory, acknowledge past uses of the land and create places for reflection, education and respect for the individuals and communities connected to this site. Liollio, in partnership with Outdoor Spatial Design (OSD), the landscape architect for the Anson Street Burial Commemoration, is the design team working on the commemoration design in coordination with the Community Engagement Council (CEC).

In addition to the SC DES and BCM, the College referenced resources from South Carolina Institute for Archaeology and Anthropology (SCIAA); South Carolina State Historic Preservation Office (SC SHPO); the National Park Service (NPS); the Advisory Council on Historic Preservation (ACHP); and Terracon Consultants on this project. **The SHPO has determined that Section 106 is not applicable for the current project, as there is no federal funding, federal permitting or licenses, or federal land involved.**

The College of Charleston established a Community Engagement Council (CEC) to support the College's stewardship of the property and to help guide thoughtful, inclusive approaches to commemoration. The

Council brings together representatives from the community, archaeologists, historians, and College stakeholders to ensure that multiple perspectives inform how the site is understood, interpreted and remembered. Through dialogue, collaboration and shared expertise, the Council will help the College honor the property's layered history, recommend appropriate forms of commemoration anid foster transparency and trust as the College moves forward as a responsible steward of this important place. For additional information regarding the CEC and proposed project, see this webpage: https://coming-street-commons.charleston.edu/community-engagement-council.

A records search for a half-mile radius of the project area identified 38 previously recorded archaeological resources (See **Attachment 3**). Additionally, there are four historic areas; 134 historic structures; one Revolutionary War point; and 23 NRHP points (See **Attachment 3**). Four cultural resources surveys were performed within the half-mile radius in addition to two reports that focus on the YWCA and Cemetery (See **Attachment 3**).

The College recognizes the significance and sensitivity involved in any excavation or disturbance of Public Burial Ground B. By way of this letter, we are requesting that you provide any documentation that links the burials at this site with your Tribal ancestors and any corresponding protocols. The College recognizes the Indigenous history of this region and the treaties connected to it, as well as the significant contributions Native American communities have made to this portion of South Carolina. We also recognize the painful legacy of displacement and ongoing erasure of Native history. Should you have any questions, comments, or would like to set up a virtual meeting at a mutually agreeable time, please contact Ms. Laura Lee Worrell, Senior Project Manager, Facilities Management, at the College of Charleston, 133 Calhoun Street, Office 211, Charleston, South Carolina, 29424 or via email at worrellLL@cofc.edu.

Respectfully,

LAURA LEE WORRELL

Senior Project Manager, Facilities Management

Attachments:

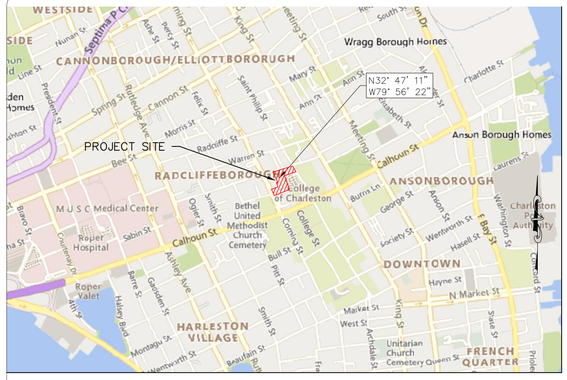
1. Map of Proposed Project Location and associated locational information
2. Historical Maps and Images
3. Cultural Resources Records Search for one-half mile radius of project location **(Confidential)**

APPENDIX I: SWPPP–STORM WATER POLLUTION PREVENTION PLAN

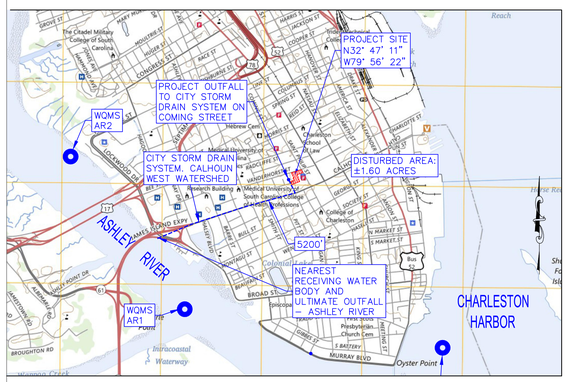
COLLEGE OF CHARLESTON
PROJECT 205 NEW CONSTRUCTION - EARLY SITE PACKAGE

106 COMING STREET
CITY OF CHARLESTON, SOUTH CAROLINA
TMS# MULTIPLE TRC-SP2025-000857

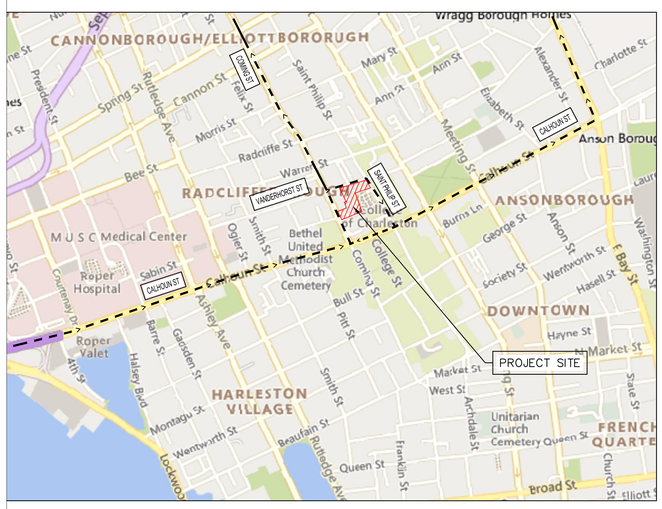
ARCHEOLOGICAL NOTICE TO CONTRACTORS:
AN ARCHEOLOGICAL WORK PLAN HAS BEEN CREATED FOR THIS SITE. THE WORK PLAN IS AVAILABLE FROM THE OWNER. ALL CONTRACTORS SHALL BE AWARE OF THE WORK PLAN AND THE REQUIREMENTS CONTAINED WITHIN AND SHALL FULLY COMPLY. ALL WORK NOT PERFORMED BY THE PROJECT ARCHEOLOGIST SHALL BE MONITORED BY THE PROJECT ARCHEOLOGIST.



LOCATION MAP
SCALE: 1" = 1,000'



QUAD MAP
SCALE: 1" = 2,000'



HAUL ROUTE MAP
SCALE: 1" = 750'

PROJECT INFORMATION

DEVELOPMENT DATA	
PROJECT NAME	COLLEGE OF CHARLESTON, PROJECT 205 NEW CONSTRUCTION - EARLY SITE PACKAGE
PROJECT DESCRIPTION	THE PROJECT INCLUDES: 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 COLLEGE HOUSING PROJECT.
PROJECT OWNER	COLLEGE OF CHARLESTON 133 CALHOUN STREET, CHARLESTON, SC 29401 POINT OF CONTACT: LAURA LEE WORRELL - (843) 953-1645
PROJECT ARCHITECT	LIOLLIO ARCHITECTURE 1640 MEETING STREET ROAD SUITE 202, CHARLESTON, SC 29405 POINT OF CONTACT: LIZ CORR, AIA - (843) 762-2222
PROJECT CIVIL ENGINEER	ADC ENGINEERING, INC. 1226 YEAMANS HALL ROAD, HANAHAN, SC 29410 POINT OF CONTACT: GARY JENSEN - (843) 735-5180
PROPERTY INFORMATION	
TMS	MULTIPLE
ADDRESS	106 COMING STREET
STREET CLASSIFICATION(S)	
COMING STREET	MAJOR COLLECTOR - STATE MAINTAINED (S-553)
VANDERHORST STREET	SECONDARY - CITY MAINTAINED
ST. PHILIP STREET	MAJOR COLLECTOR - STATE MAINTAINED (S-106)
FLOOD ZONE STATEMENT	FEDERAL EMERGENCY MANAGEMENT AGENCY FLOOD INSURANCE RATE MAP (45019C0512K) DATED JANURARY 29, 2021, INDICATES THAT THIS PROJECT SITE IS PARTIALLY IN FLOOD ZONE SHADED 'X' AND PARTIALLY IN FLOOD ZONE AE 10. FEMA BASE FLOOD ELEV. = 10.0 (NAVD 88) CITY DESIGN FLOOD ELEV. = 12.0 (NAVD 88) = FLOOD + 2'.
SUBDIVISION STATUS	PROPERTY COMBINATION PENDING
WETLAND STATUS	THERE ARE NO KNOWN WETLANDS ON-SITE
ZONING INFORMATION	
MUNICIPALITY	CITY OF CHARLESTON
EXISTING ZONING	PUD (PLANNED UNIT DEVELOPMENT)
PROPOSED ZONING	SAME
ADJACENT ZONING	
NORTH	VANDERHORST STREET
EAST	ST. PHILIP STREET & LB
SOUTH	LB
WEST	COMING STREET & DR-2
HEIGHT LIMITATION	4 STORIES / 5 STORIES
HISTORIC DISTRICT	YES
ZONING CONTACT	ERIC SCHULTZ

SETBACKS/BUFFERS

SETBACKS	REQUIRED	PROVIDED
FRONT (STREET FRONTAGE)	0' (PER PUD)	N/A
REAR	7' (PER PUD)	N/A
NORTH/EAST	3' (PER PUD)	N/A
SOUTH/WEST	7' (PER PUD)	N/A
BUFFERS	**REQUIRED**	**PROVIDED**
NORTH	N/A (PER PUD)	0'
SOUTH	N/A (PER PUD)	0'
EAST	N/A (PER PUD)	0'
WEST	N/A (PER PUD)	0'

LOT COVERAGE

TOTAL LOT AREA	84,090	SF	1.93 ACRES	
DISTURBED AREA	69,690	SF	1.60 ACRES	
EXISTING LOT COVERAGE BY USE				
BUILDING	16,550	SF	0.38 ACRES	20%
PVMT/IMPERV AREA	47,480	SF	1.09 ACRES	56%
LANDSCAPE AREA	20,060	SF	0.46 ACRES	24%
POND	0	SF	0.00 ACRES	0%
SUBTOTAL	84,090	SF	1.93 ACRES	100%

UTILITY INFORMATION

ELECTRIC AVAILABILITY	DOMINION ENERGY
GAS AVAILABILITY	DOMINION ENERGY
SEWER AVAILABILITY	CHARLESTON WATER SYSTEM
STORM AVAILABILITY	CITY OF CHARLESTON
WATER AVAILABILITY	CHARLESTON WATER SYSTEMS

OFF STREET PARKING INFORMATION

OFF STREET PARKING: N/A		
SPACES REQUIRED	N/A	
SPACES PROVIDED	=	

LIST OF DRAWINGS

SHEET	TITLE	ISSUED	REVISED
	CIVIL DRAWINGS		
C001	CIVIL COVER SHEET	3/16/2026	
C002	CIVIL NOTES & ABBREVIATIONS	3/16/2026	
C003a	TOPOGRAPHIC SURVEY - SHEET 1	10/14/2025	
C003b	TOPOGRAPHIC SURVEY - SHEET 2	10/14/2025	
C100	SWPPP & EROSION CONTROL - INITIAL PHASE	3/16/2026	
C101	SWPPP & EROSION CONTROL - DEMO & ARCHEOLGOICAL PHASE	3/16/2026	
C110	EXISTING CONDITIONS & DEMOLITION PLAN	3/16/2026	
C610	CIVIL DETAILS - SWPPP & EROSION CONTROL	3/16/2026	
C611	CIVIL DETAILS - SWPPP & EROSION CONTROL	3/16/2026	
C612	CIVIL DETAILS - SWPPP & EROSION CONTROL NOTES	3/16/2026	
	REFERENCE DRAWINGS FOR PERMITTING		
BZA-SD	TREE REMOVAL VARIANCE EXHIBIT	-	

DRAWING REVISIONS

REV #	DESCRIPTION	ISSUED

MUNICIPAL COMMITTEE/BOARD APPROVALS

REVIEW	SUBMITTAL DATE	MEETING DATE	STATUS
TRC SKETCH PLAN	5/7/2025	5/21/2025	REVIEWED
TRC #1	8/11/2025	8/28/2025	REVIEWED
TRC #2	9/15/2025	10/2/2025	REVIEWED

VARIANCES/SPECIAL EXCEPTIONS

VARIANCE/SPECIAL EXCEPTIONS	SUBMITTAL DATE	MEETING DATE	CONDITIONS
BZA-SD VARIANCE FROM 54-327 TO REMOVE 1 GRAND TREE SPECIAL EXCEPTION FROM 54-327 TO REMOVE 1 GRAND TREE VARIANCE FROM 54-327 TO OMIT 15 PROTECTED TREES PER ACRE REQUIREMENT	8/28/2025	APPROVED 11/05/2025	APPROVED TREE REMOVAL WITH THE FOLLOWING CONDITIONS: MUST PLANT 61 CALIPER INCHES OF NATIVE CANOPY TREES ON THE PROJECT SITE; ANY RESIDUAL INCHES THAT CANNOT BE SATISFIED ON-SITE CAN BE IN THE FORM OF A CONTRIBUTION TO THE CITY'S STREET TREE PROGRAM. PROVIDE LANDSCAPE PLAN FOR STAFF REVIEW AND APPROVAL TREES TO BE CUT TO STUMP ONLY (FLUSH WITH GROUND); NO LAND DISTURBANCE UNTIL THE PROJECT IS PERMITTED FOR LAND DISTURBANCE.

STORMWATER DESIGN STANDARDS MANUAL VARIANCES

APPLICABLE SECTION	DESCRIPTION OF THE VARIANCE	SUBMITTAL DATE	APPROVAL DATE
N/A	N/A		

ADC ENGINEERING
1226 YEAMANS HALL ROAD
HANAHAN, SC 29410 ADC PROJECT
843-566-0161 #25039
ADCENGINEERING.COM

SC811

SOUTH CAROLINA PROFESSIONAL ENGINEER No. 14567 CHRISTOPHER B. COOK 3/16/26

SOUTH CAROLINA BOARD OF REGISTRATION FOR PROFESSIONAL ENGINEERS AND LAND SURVEYORS ADC ENGINEERING INC. No. 00253

△	Revision Date	Description

EARLY SITE PACKAGE

106 COMING STREET

COLLEGE of CHARLESTON 1770

PROJECT 205 NEW CONSTRUCTION

State Project Number:	H15-9689-PD
Project Number:	25700
Checked By:	CBC / GFJ
Drawn By:	ARW
Date:	03/16/26
Scale:	

C001
CIVIL COVER SHEET

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GENERAL NOTES:

1. THE EROSION CONTROL PLANS CONTAINED HERE-IN ARE PART OF A LARGER COMPREHENSIVE STORMWATER POLLUTION PREVENTION PLAN (SWPPP). ALL CONTRACTORS/SUBCONTRACTORS/PERSONS THAT WILL BE ENGAGED IN LAND DISTURBING ACTIVITIES SHALL BECOME FAMILIAR WITH AND COMPLY WITH ALL EROSION AND SEDIMENT CONTROL AND STORMWATER POLLUTION PREVENTION REQUIREMENTS CONTAINED THROUGHOUT THE SWPPP, DRAWINGS, SPECIFICATIONS AND PERMITS.
2. ALL CONTRACTORS SHALL VISIT THE SITE PRIOR TO BIDDING TO DETERMINE THE EXTENT OF THE PROJECT.
3. TOPOGRAPHIC AND BOUNDARY INFORMATION BY FORSBERG ENGINEERING AND SURVEYING, INC., NOT VERIFIED BY ADC ENGINEERING, INC.
4. HORIZONTAL COORDINATES ARE BASED ON SC STATE PLANE COORDINATES NAD '83. VERTICAL DATUM IS BASED ON NAVD 88.
5. ALL PROJECT STAKEOUT, INCLUDING RELOCATION OF PROJECT BENCHMARKS AS NECESSARY, SHALL BE PERFORMED BY A REGISTERED LAND SURVEYOR TO BE PAID FOR BY THE CONTRACTOR. FOR STAKEOUT, DO NOT RELY SOLELY ON THE PHYSICAL SCALE AS SHOWN IN DRAWINGS. REFER TO THE GIVEN DIMENSIONS, SYMBOL LEGEND, KEYNOTES, AND REFERENCED DETAILS FOR CORRECT STAKEOUT.
6. THE EXISTING UNDERGROUND UTILITIES SHOWN HEREON ARE BASED UPON AVAILABLE INFORMATION. THE CONTRACTOR SHALL BE RESPONSIBLE FOR DETERMINING THE EXACT LOCATION OF ALL UTILITIES PRIOR TO BEGINNING ANY WORK. IF UTILITIES OTHER THAN THOSE SHOWN HEREON ARE ENCOUNTERED, THE CONTRACTOR SHALL NOTIFY THE ENGINEER IMMEDIATELY AND TAKE APPROPRIATE MEASURES TO PROTECT THE LINE(S) AND ENSURE CONTINUED SERVICE. DAMAGE CAUSED TO EXISTING UTILITIES BY THE CONTRACTOR SHALL BE REPAIRED BY THE CONTRACTOR AT NO ADDITIONAL COST TO THE OWNER. THE CONTRACTOR SHALL VERIFY THE CONNECTION POINTS OF NEW UTILITIES TO EXISTING UTILITIES PRIOR TO BEGINNING CONSTRUCTION.
7. THE CONTRACTOR SHALL INSTALL TREE PROTECTION BARRICADES PRIOR TO BEGINNING EARTHWORK OPERATIONS.
8. OFFSITE BORROW NECESSARY FOR THE CONSTRUCTION OF THIS PROJECT SHALL BE PROVIDED BY THE CONTRACTOR FROM SOURCES DEVELOPED BY THE CONTRACTOR.
9. THE CONTRACTOR SHALL NOTIFY THE ENGINEER IF UNSUITABLE MATERIAL IS DISCOVERED PRIOR TO BEGINNING ANY REMOVAL OPERATION.
10. THE CONTRACTOR SHALL PLACE 4" OF TOPSOIL IN ALL DISTURBED AREAS NOT TO BE PAVED. THE CONTRACTOR SHALL ALSO PROVIDE TEMPORARY AND PERMANENT SEEDING IN ALL AREAS INSIDE OR OUTSIDE THE LIMITS OF CONSTRUCTION THAT ARE DISTURBED BY THE CONTRACTOR'S OPERATIONS.
11. ALL TRAFFIC CONTROL SIGNS AND PAVEMENT MARKINGS SHALL BE IN ACCORDANCE WITH THE MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES FOR STREETS AND HIGHWAYS AND THE SOUTH CAROLINA MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES, BOTH CURRENT EDITIONS.
12. CONTRACTOR SHALL GRADE ALL AREAS TO DRAIN FOR POSITIVE FLOW PRIOR TO FINAL APPROVAL.
13. THE DESIGN ADEQUACY AND SAFETY OF ALL BRACING, SHORING AND TEMPORARY SUPPORTS, ETC. IS THE SOLE RESPONSIBILITY OF THE CONTRACTOR.
14. THE GENERAL CONTRACTOR SHALL REVIEW AND STAMP APPROVED ANY AND ALL SHOP DRAWINGS AND SUBMITTALS PRIOR TO SUBMITTING TO THE ENGINEER FOR REVIEW.
15. IT IS THE RESPONSIBILITY OF THE OWNER TO OBTAIN THE SERVICES OF A QUALIFIED GEOTECHNICAL ENGINEER WHO SHALL PERFORM INVESTIGATIONS TO VERIFY THAT THE SOIL CONDITIONS ARE AT LEAST THAT WHICH ARE STATED HEREIN.
16. ALL UTILITY WORK SHALL BE PERFORMED IN ACCORDANCE WITH THE REQUIREMENTS OF SCDES AND CHARLESTON WATER SYSTEM. WHERE ANY DISCREPANCIES EXIST BETWEEN THESE DOCUMENTS, SCDES AND CHARLESTON WATER SYSTEM REQUIREMENTS, THE MORE STRINGENT REQUIREMENTS SHALL GOVERN.
17. IN PERFORMING CONSTRUCTION OBSERVATION VISITS TO THE JOB SITE, THE ENGINEER SHALL HAVE NO CONTROL OVER NOR RESPONSIBILITY FOR THE CONTRACTOR'S MEANS, METHODS, SEQUENCE, TECHNIQUES OR PROCEDURES IN PERFORMING THE WORK.
18. THE CONTRACTOR'S MEANS, METHODS, SEQUENCE, TECHNIQUES OR PROCEDURES IN PERFORMING THE WORK IS SOLELY THE RESPONSIBILITY OF THE CONTRACTOR, WHO IS ALSO RESPONSIBLE FOR COMPLYING WITH ALL HEALTH AND SAFETY PRECAUTIONS AS REQUIRED BY ANY REGULATORY AGENCY.
19. IT IS THE CONTRACTORS RESPONSIBILITY FOR DESIGN, ADEQUACY AND IMPLEMENTATION OF ALL DEWATERING. ALL DEWATERING ACTIVITIES SHALL BE IN ACCORDANCE WITH THE REQUIREMENTS OF THE STORMWATER POLLUTION PREVENTION PLAN.
20. CONTRACTOR SHALL MAINTAIN SIGHT DISTANCE VISIBILITY AT ALL EXITS AND/OR INTERSECTIONS IN ACCORDANCE WITH SCDOT'S "ACCESS AND ROADSIDE MANAGEMENT STANDARDS" MANUAL, DURING AND AFTER CONSTRUCTION.
21. ANY FIELD CHANGES WITHIN SCDOT RIGHT-OF-WAY OR CHANGES THAT WOULD IMPACT SCDOT RIGHT-OF-WAY WILL REQUIRE WRITTEN SCDOT APPROVAL PRIOR TO CHANGES BEING IMPLEMENTED IN THE FIELD.

TRAFFIC CONTROL NOTES:

1. CONTRACTOR SHALL PERFORM ALL NECESSARY COORDINATION WITH SCDOT AND THE MUNICIPALITY FOR WORK INSIDE THE RIGHT OF WAY, INCLUDING BUT NOT LIMITED TO PREPARATION OF AND OBTAINING APPROVAL OF ALL NECESSARY TRAFFIC CONTROL PLANS AS WELL AS PLANNING AND EXECUTION OF ALL NECESSARY COORDINATION MEETINGS.
2. CONTRACTOR SHALL PERFORM ALL WORK IN ACCORDANCE WITH THE APPROVED ENCROACHMENT PERMIT(S).
3. CONTRACTOR SHALL MAINTAIN SCDOT SITE VISIBILITY TRIANGLES AT ALL ACCESS POINTS FOR THE DURATION OF CONSTRUCTION.
4. ALL TRAFFIC CONTROL SIGNS AND PAVEMENT MARKINGS SHALL BE IN ACCORDANCE WITH THE MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES FOR STREETS AND HIGHWAYS (MUTCD), CURRENT EDITION.

CITY OF CHARLESTON ADA NOTES:

1. RIGHT-OF-WAY SHALL REMAIN ADA COMPLIANT DURING ALL CONSTRUCTION PHASES, OR AN ALTERNATE ACCESSIBLE ROUTE SHALL BE PROVIDED.

CIVIL ABBREVIATIONS

BM	BENCHMARK
BMP	EROSION CONTROL BEST MANAGEMENT PRACTICES
BTTM	BOTTOM
BW	BOTH WAYS
CB	CATCH BASIN
CGP	NPDES CONSTRUCTION GENERAL PERMIT SCR 100000
CI	CURB INLET
CI	CAST IRON
CIP	CAST IRON PIPE
CL	CENTERLINE
CMP	CORRUGATED METAL PIPE
CO	CLEANOUT
CONC	CONCRETE
CY	CUBIC YARDS
DCVA	DOUBLE CHECK VALVE ASSEMBLY
DI	DROP INLET
DIA	DIAMETER
DIP	DUCTILE IRON PIPE
DS	DOWNSPOUT
EL	ELEVATION
EW	EACH WAY
EXST	EXISTING
FFE	FINISHED FLOOR ELEVATION
FG	FINISHED GRADE
FH	FIRE HYDRANT
FIN	FINISHED
FM	FORCE MAIN
GI	GRATE INLET
HDPE	HIGH DENSITY POLYETHYLENE
IAW	IN ACCORDANCE WITH
IE	INVERT ELEVATION
JB	JUNCTION BOX
LF	LINEAR FEET
LP	LIGHT POLE
MATL	MATERIAL
MAX	MAXIMUM
MH	MANHOLE
MIN	MINIMUM
NIC	NOT IN CONTRACT
NOI	NOTICE OF INTENT
NOT	NOTICE OF TERMINATION
NPDES	NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
NTS	NOT TO SCALE
OC	ON CENTER
ODSA	OPERATOR OF DAY TO DAY SITE ACTIVITIES
PC	POINT OF CURVATURE
PCC	PORTLAND CEMENT CONCRETE
PP	POWER POLE
PT	POINT OF TANGENT
PVC	POLYVINYL CHLORIDE
PVMT	PAVEMENT
RAD	RADIUS
RCP	REINFORCED CONCRETE PIPE
RD	ROOF DRAIN
REQD	REQUIRED
RPBP	REDUCED PRESSURE BACKFLOW PREVENTER
R/W	RIGHT OF WAY
SABC	STABILIZED AGGREGATE BASE COURSE
SB	SILT BARRIER
SCDES	SOUTH CAROLINA DEPT OF ENVIRONMENTAL SERVICES
SCDOT	SOUTH CAROLINA DEPT OF TRANSPORTATION
SD	STORM DRAINAGE
SF	SQUARE FEET
SS	SANITARY SEWER SERVICE
STA	STATION
SWPPP	STORM WATER POLLUTION PREVENTION PLAN
TBM	TEMPORARY BENCH MARK
TC	TOP OF CURB
TG	TOP OF GUTTER
TP	TOP OF PAVEMENT
TYP	TYPICAL
VC	VITRIFIED CLAY
W	WATER
W/	WITH
WS	WATER SERVICE
WV	WATER VALVE

CITY OF CHARLESTON TRAFFIC & TRANSPORTATION NOTES:

1. IF TRAFFIC SIGNALS OR TRAFFIC SIGNAL EQUIPMENT IS IMPACTED IN ANY WAY, THESE ITEMS MUST BE COORDINATED WITH TRAFFIC AND TRANSPORTATION PRIOR TO ANY WORK NEAR THE INTERSECTION.
2. SIGHT DISTANCE VISIBILITY AT ALL EXITS AND/OR INTERSECTIONS WILL BE MAINTAINED IN ACCORDANCE WITH SCDOT'S ACCESS AND ROADSIDE MANAGEMENT STANDARDS MANUAL. SIGHT DISTANCE VISIBILITY MUST BE MAINTAINED DURING DEMOLITION AND CONSTRUCTION. NO FENCING OR OTHER OBSTRUCTIONS WILL BE PERMITTED IF THEY IMPACT SIGHT DISTANCE VISIBILITY.
3. IF TRAFFIC SIGNS OR MARKINGS WITHIN THE RIGHT-OF-WAY ARE IMPACTED, RELOCATION OF THESE ITEMS MUST BE COORDINATED WITH TRAFFIC AND TRANSPORTATION.
4. IF THE STREET OR METERED PARKING SPACES ARE BLOCKED OR METERED PARKING SPACES THAT ARE NOT APPROVED FOR REMOVAL ARE IMPACTED DURING CONSTRUCTION AT ANY TIME FOR ANY REASON A STREET BLOCKING PERMIT AND/OR A METER BAG PERMIT WILL BE REQUIRED. NO CONSTRUCTION PARKING OR STAGING WILL BE PERMITTED WITHIN THE RIGHT-OF-WAY WITHOUT PRIOR AUTHORIZATION BY TRAFFIC AND TRANSPORTATION.
5. LANE CLOSURES OF ANY TYPE OR DURATION WITHIN THE RIGHT-OF-WAY MUST BE APPROVED BY TRAFFIC AND TRANSPORTATION WELL IN ADVANCE OF THE OCCURRENCE. NO CONSTRUCTION PARKING OR STAGING WILL BE ALLOWED WITHIN THE RIGHT-OF-WAY WITHOUT PRIOR APPROVAL BY TRAFFIC AND TRANSPORTATION.
6. REMOVAL OR CHANGES TO PARKING METERS AND/OR PARKING METERED SPACES OR OTHER ON-STREET PARKING MUST BE COORDINATED WITH TRAFFIC AND TRANSPORTATION PRIOR TO ANY WORK THAT MAY IMPACT PARKING.
7. CONSTRUCTION AND DEMOLITION TRAFFIC MUST AVOID RESIDENTIAL STREETS AT ALL TIMES UNLESS THERE ARE NO ALTERNATIVE ROUTES. IF IMPACTS TO RESIDENTIAL STREETS ARE ANTICIPATED, THE CONTRACTOR SHOULD CALL TRAFFIC AND TRANSPORTATION PRIOR TO USING THE ROUTE.

CITY OF CHARLESTON TRAFFIC & STREET NAME SIGN STANDARDS & NOTES:

1. CONTRACTOR SHALL CONTACT THOMAS TISDALE, TRAFFIC OPERATIONS MANAGER, PRIOR TO THE REMOVAL, RELOCATION, OR INSTALLATION OF ANY TRAFFIC OR PARKING SIGNS AT 843-973-7288 OR TISDALET@CHARLESTON-SC.GOV.
2. ALL TRAFFIC SIGNS SHOULD BE DESIGNED AND PLACED IN ACCORDANCE WITH THE MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES FOR STREETS AND HIGHWAYS (MUTCD), LATEST EDITION, PUBLISHED BY THE U.S. DEPARTMENT OF TRANSPORTATION.
3. ALL REGULATORY, WARNING, AND GUIDE SIGNS SHALL BE FABRICATED WITH ASTM INTERNATIONAL, FORMERLY AMERICAN SOCIETY FOR TESTING AND MATERIALS, TYPE III (HIGH INTENSITY) OR GREATER RETRO-REFLECTIVE SHEETING. UPON APPROVAL BY THE DEPARTMENT OF TRAFFIC AND TRANSPORTATION PARKING SIGNS AND NON-TRAFFIC RELATED SIGNS MAY BE FABRICATED WITH ASTM TYPE I (ENGINEER GRADE) OR GREATER MATERIAL.
4. IF A SUPPLEMENTAL PLAQUE OR SECONDARY SIGN IS PERMITTED TO BE MOUNTED ON THE SAME ASSEMBLY AS ANOTHER SIGN, THE MAJOR (MOST IMPORTANT) SIGN SHALL BE INSTALLED ABOVE THE SUPPLEMENTAL PLAQUE OR SECONDARY SIGN. THE MINIMUM HEIGHT FROM THE BOTTOM OF THE SUPPLEMENTAL PLAQUE OR SECONDARY SIGN TO THE NEAR EDGE OF THE PAVEMENT SHALL BE 6'.
5. THE MINIMUM LATERAL OFFSET FOR INSTALLED SIGNS SHOULD BE 2' MEASURED FROM THE NEAREST SIGN EDGE TO THE PAVEMENT EDGE (OR THE FACE OF CURB). A MINIMUM OFFSET OF 1' FROM THE FACE OF THE CURB MAY BE USED IN AREAS WHERE SIDEWALK WIDTH IS LIMITED OR WHERE EXISTING POLES ARE CLOSE TO THE CURB.
6. ALL TRAFFIC SIGN POSTS SHOULD BE SECURELY INSTALLED AT LEAST 36 INCHES IN THE GROUND. TRAFFIC SIGN POSTS SHOULD BE GREEN, 3 LBS/FT STEEL U-CHANNEL POSTS, BREAKAWAY, AND 12' IN LENGTH EXCEPT FOR STREET NAME SIGN POSTS.
7. THERE SHALL BE NO ON-STREET PARKING ALLOWED UNLESS OTHERWISE DESIGNATED.
8. ALL PAVEMENT MARKINGS (INCLUDING PARKING) SHALL BE THERMOPLASTIC. ALL MARKINGS SHALL BE INSTALLED IN ACCORDANCE WITH S.C.D.O.T. STANDARD SPECIFICATION AND MUTCD.
9. LANE CLOSURES OF ANY TYPE OR DURATION MUST BE APPROVED BY TRAFFIC AND TRANSPORTATION WELL IN ADVANCE OF THE OCCURRENCE. NO CONSTRUCTION, PARKING, OR STAGING WILL BE ALLOWED WITHIN THE RIGHT-OF-WAY WITHOUT PRIOR APPROVAL BY TRAFFIC AND TRANSPORTATION.

CITY OF CHARLESTON DRAINAGE NOTES:

1. IF NECESSARY SLOPES THAT EXCEED 8 VERTICAL FEET SHALL BE STABILIZED WITH SYNTHETIC OR VEGETATIVE MATS IN ADDITION TO HYDROSEEDING. IT MAY BE NECESSARY TO INSTALL TEMPORARY SLOPE DRAINS DURING CONSTRUCTION. TEMPORARY BERMS MAY BE NEEDED UNTIL THE SLOPE IS BROUGHT TO GRADE.
2. STABILIZATION MEASURES SHALL BE INITIATED AS SOON AS PRACTICABLE IN PORTIONS OF THE SITE WHERE CONSTRUCTION ACTIVITIES HAVE TEMPORARILY OR PERMANENTLY CEASED, BUT IN NO CASE MORE THAN 14 DAYS AFTER WORK HAS CEASED, EXCEPT AS STATED BELOW:
   - WHERE STABILIZATION BY THE 14TH DAY IS PRECLUDED BY SNOW COVER OR FROZEN GROUND CONDITIONS, STABILIZATION MEASURES SHALL BE INITIATED AS SOON AS PRACTICABLE.
   - WHERE CONSTRUCTION ACTIVITY ON A PORTION OF THE SITE IS TEMPORARILY CEASED AND EARTH-DISTURBING ACTIVITIES ON THAT PORTION OF THE SITE WILL BE RESUMED WITHIN 14 DAYS, TEMPORARY STABILIZATION MEASURES DO NOT HAVE TO BE INITIATED ON THAT PORTION OF THE SITE.
3. FINAL STABILIZATION SHALL PROVIDE A UNIFORM (I.E., EVENLY DISTRIBUTED, WITHOUT LARGE BARE AREAS) PERENNIAL VEGETATIVE COVER WITH A DENSITY OF 70 PERCENT OF THE NATIVE BACKGROUND VEGETATIVE COVER FOR THE AREA HAS BEEN ESTABLISHED ON ALL UNPAVED AREAS AND AREAS NOT COVERED BY PERMANENT STRUCTURES.
4. EPSC MEASURES SHALL BE ROUTINELY INSPECTED EVERY SEVEN DAYS AND AFTER EACH RAINFALL OCCURRENCE THAT EXCEEDS 0.5 INCH. THE INSPECTION SCHEDULE SHALL BE CLEARLY STATED ON THE PLANS AND IN THE EPSC PLAN. DAMAGED OR INEFFECTIVE DEVICES SHALL BE REPAIRED OR REPLACED. INSPECTION FREQUENCIES FOR PORTIONS OF THE CONSTRUCTION SITE THAT HAVE REACHED TEMPORARY OR FINAL STABILIZATION MAY BE REDUCED TO AT LEAST ONCE EVERY MONTH, AS LONG AS THE STABILIZATION IS MAINTAINED AND THERE IS NO ADDITIONAL DISTURBANCE IN THESE AREAS.
5. SILT FENCE AND/OR OTHER SEDIMENT CONTROL DEVICES SHALL BE PROVIDED TO CONTROL SEDIMENTATION DURING UTILITY CONSTRUCTION. DISTURBED AREAS SHALL BE CLEANED, GRADED, AND STABILIZED WITH GRASSING IMMEDIATELY AFTER THE UTILITY INSTALLATION.
6. EPSC MEASURES SHALL BE PROPERLY MAINTAINED DURING ALL PHASES OF CONSTRUCTION UNTIL THE COMPLETION OF CONSTRUCTION ACTIVITIES AND DISTURBED AREAS HAVE BEEN FINALLY STABILIZED. ADDITIONAL EPSC MEASURES MAY BE REQUIRED DURING CONSTRUCTION TO PREVENT EROSION AND OFFSITE SEDIMENTATION. TEMPORARY CONTROL DEVICES SHALL BE REMOVED ONCE CONSTRUCTION IS COMPLETE AND THE SITE IS FINALLY STABILIZED.
7. SEDIMENT TRACK-OUT SHALL BE MINIMIZED BY USING APPROVED CONSTRUCTION ENTRANCES AT ALL POINTS THAT EXIT ONTO PAVED ROADS AND RESTRICT VEHICLE USE TO PROPERLY DESIGNATED EXIT POINTS. SEDIMENT SHALL BE REMOVED FROM PAVEMENT AS REQUIRED.
8. RESIDENTIAL SUBDIVISIONS REQUIRE EPSC FEATURES FOR INFRASTRUCTURE AS WELL AS FOR INDIVIDUAL LOT CONSTRUCTION. INDIVIDUAL PROPERTY OWNERS SHALL FOLLOW THESE PLANS DURING CONSTRUCTION.
9. TEMPORARY DIVERSION BERMS AND/OR DITCHES SHALL BE PROVIDED AS NEEDED DURING CONSTRUCTION TO PROTECT WORK AREAS FROM UPSLOPE RUNOFF AND/OR TO DIVERT SEDIMENT-LADEN WATER TO APPROPRIATE TRAPS OR STABLE OUTLETS.
10. IF WATER IS ENCOUNTERED WHILE TRENCHING, THE WATER SHALL BE FILTERED TO REMOVE ANY SEDIMENT BEFORE BEING PUMPED BACK INTO THE STABLE OUTLET(S).
11. SEDIMENT CONTROLS SHALL BE INSTALLED ALONG PERIMETER AREAS OF THE SITE THAT WILL RECEIVE POLLUTANT DISCHARGES AND REMOVE SEDIMENT BEFORE IT HAS ACCUMULATED TO ONE-THIRD OF THE ABOVEGROUND HEIGHT OF PERIMETER CONTROL.
12. STOCKPILES SHALL BE LOCATED OUTSIDE OF NATURAL BUFFERS AND AWAY FROM STORMWATER CONVEYANCES, DRAIN INLETS, AND AREAS WHERE STORMWATER FLOW IS CONCENTRATED. A SEDIMENT BARRIER SHALL BE INSTALLED ALONG DOWNGRADIENT PERIMETER AREAS. FOR PILES THAT WILL BE UNUSED FOR 14 OR MORE DAYS, COVER OR APPROPRIATE TEMPORARY STABILIZATION SHALL BE PROVIDED.
13. DUST GENERATION SHALL BE MINIMIZED IN AREAS OF EXPOSED SOIL OR GRAVEL THROUGH THE APPROPRIATE APPLICATION OF WATER OR OTHER DUST SUPPRESSION TECHNIQUES.
14. STORM DRAIN INLETS SHALL BE PROTECTED BY INSTALLING INLET PROTECTION MEASURES THAT REMOVE SEDIMENT FROM DISCHARGES PRIOR TO ENTRY INTO A STORM DRAIN INLET. CLEAN, OR REMOVE AND REPLACE, THE PROTECTION MEASURES AS SEDIMENT ACCUMULATES, THE FILTER BECOMES CLOGGED, OR PERFORMANCE IS COMPROMISED.
15. EROSION CONTROLS AND VELOCITY DISSIPATION DEVICES SHALL BE USED WITHIN AND ALONG THE LENGTH OF ANY STORMWATER CONVEYANCE CHANNEL AND AT ANY OUTLET TO SLOW DOWN RUNOFF TO MINIMIZE EROSION.
16. LITTER, CONSTRUCTION DEBRIS, OILS, FUELS, BUILDING PRODUCTS WITH SIGNIFICANT POTENTIAL FOR IMPACT (SUCH AS STOCKPILES OF FRESHLY TREATED LUMBER), AND CONSTRUCTION CHEMICALS THAT COULD BE EXPOSED TO STORMWATER SHALL BE PREVENTED FROM BECOMING A POLLUTANT SOURCE IN STORMWATER DISCHARGES.
17. CATCH BASINS SHALL BE FIELD STAKED TO ENSURE PROPER CATCH BASIN INLET ALIGNMENT WITH THE STREET GUTTER LINE.
18. STORM DRAINAGE LINES SHALL BE STAKED AT EACH BOX OR AT INTERVALS THAT WOULD BE SUFFICIENT TO CHECK ALIGNMENT AND GRADE OF THE CONSTRUCTION WITH THE APPROVED PLANS. THE USE OF LASERS TO AUGMENT CONTROL IS ENCOURAGED.

ADC ENGINEERING
1226 YEAMANS HALL ROAD
HANAHAN, SC 29410
843-566-0161
ADCENGINEERING.COM
ADC PROJECT #25039

SC811

SOUTH CAROLINA LICENSED PROFESSIONAL ENGINEER No. 14567 CHRISTOPHER B. COOK DATE 3/16/26

SOUTH CAROLINA ADC ENGINEERING INC. No. 00253 CERTIFICATE OF AUTHORIZATION

△	Revision Date	Description

EARLY SITE PACKAGE

106 COMING STREET

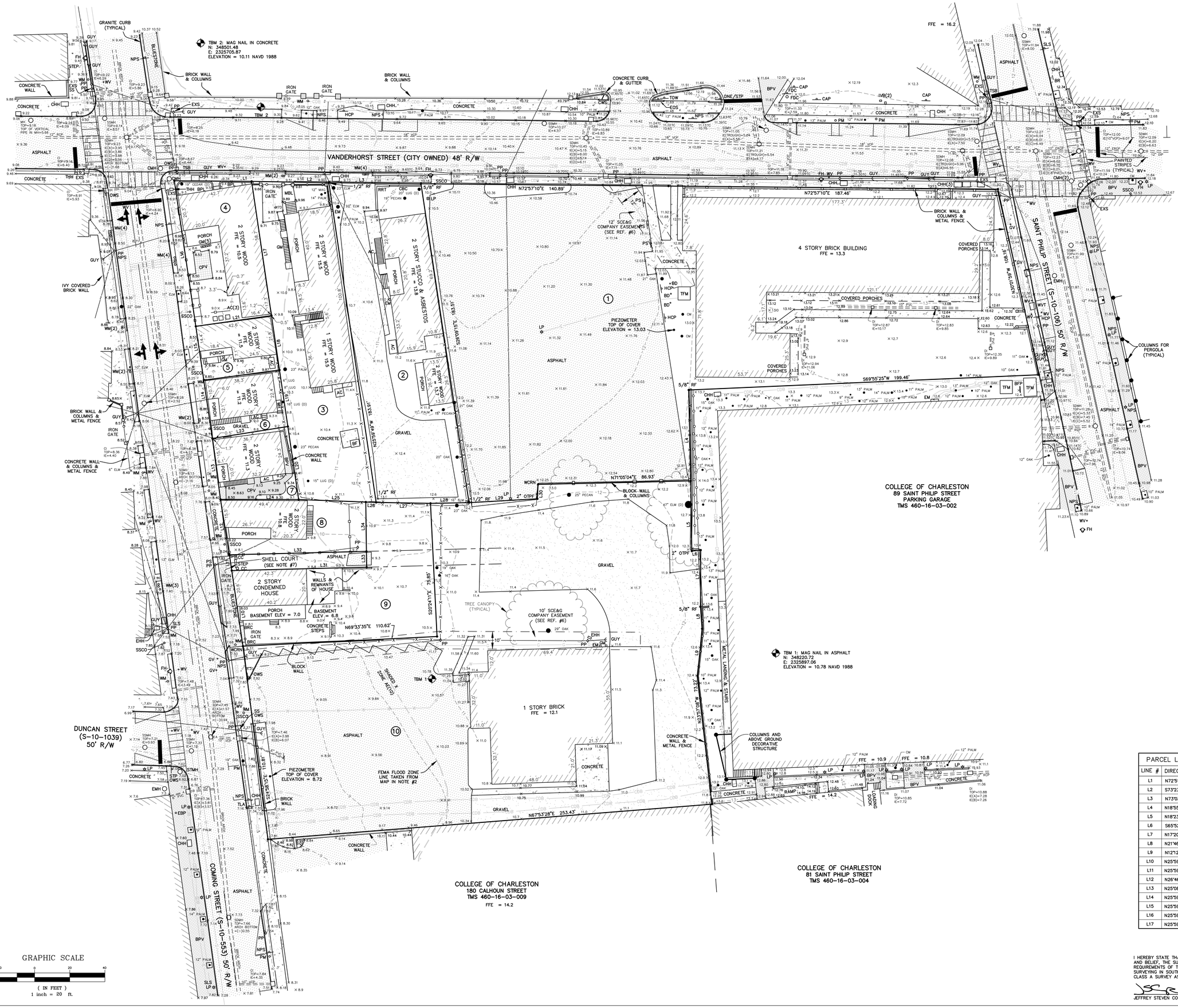
COLLEGE of CHARLESTON 1770

PROJECT 205 NEW CONSTRUCTION

State Project Number:	H15-9689-PD
Project Number:	25700
Checked By:	CBC / GFJ
Drawn By:	ARW
Date:	03/16/26
Scale:	

C002
CIVIL NOTES AND ABBREVIATIONS

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PARCEL LINE TABLE		
LINE #	DIRECTION	LENGTH
L1	N72°51'40"E	44.00'
L2	S73°23'14"W	43.97'
L3	N73°03'18"E	52.42'
L4	N18°55'03"W	51.73'
L5	N18°23'24"W	39.97'
L6	S65°52'11"W	5.11'
L7	N17°20'29"W	32.20'
L8	N21°46'22"W	12.59'
L9	N12°12'36"W	27.18'
L10	N25°59'23"W	43.48'
L11	N25°59'23"W	9.06'
L12	N26°46'13"W	31.93'
L13	N25°08'45"W	35.00'
L14	N25°59'49"W	33.52'
L15	N25°59'49"W	30.98'
L16	N25°59'49"W	83.72'
L17	N25°59'49"W	77.21'

PARCEL LINE TABLE		
LINE #	DIRECTION	LENGTH
L18	N25°59'49"W	31.29'
L19	N25°59'49"W	32.50'
L20	N25°59'49"W	42.00'
L21	N64°21'10"E	43.48'
L22	S64°45'30"W	43.48'
L23	S63°25'02"W	43.48'
L24	S72°28'58"W	44.48'
L25	S74°33'02"W	38.23'
L26	S74°33'02"W	5.90'
L27	S73°24'31"W	30.95'
L28	S71°18'28"W	21.92'
L29	S69°15'43"W	38.95'
L30	S14°34'38"E	8.23'
L31	N70°58'43"E	76.80'
L32	N70°58'43"E	78.00'
L33	N18°22'14"W	9.00'
L34	N18°22'14"W	28.09'

I HEREBY STATE THAT TO THE BEST OF MY PROFESSIONAL KNOWLEDGE, INFORMATION, AND BELIEF, THE SURVEY SHOWN HEREON WAS MADE IN ACCORDANCE WITH THE REQUIREMENTS OF THE MINIMUM STANDARDS MANUAL FOR THE PRACTICE OF LAND SURVEYING IN SOUTH CAROLINA, AND MEETS OR EXCEEDS THE REQUIREMENTS FOR A CLASS A SURVEY AS SPECIFIED THEREIN.

JEFFREY STEVEN COOPER, S.C. PLS #12516

FORSBERG ENGINEERING AND SURVEYING, INC.
1587 SAVANNAH HIGHWAY SUITE B
P.O. BOX 30575
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CIVIL ENGINEERING, SURVEYING AND LAND PLANNING

FORSBERG ENGINEERING & SURVEYING, INC. No. C00343
CERTIFICATE OF AUTHORIZATION

TOPOGRAPHIC SURVEY

10 PARCELS
LOCATED ON SAINT PHILIP STREET, VANDERHORST STREET & COMING STREET

CITY OF CHARLESTON, CHARLESTON COUNTY, SOUTH CAROLINA

REGISTERED LAND SURVEYOR 12516 JEFFREY STEVEN COOPER
JEFFREY S COOPER

DATE
APRIL 21, 2025

DRAWN/CHECKED
JSC/LSM

LAST REVISED
OCTOBER 14, 2025

APPROVED
JSC

SCALE
1" = 20'

PROJECT NO.
6490

SHEET NUMBER
C-003a
1
OF 2

NOTES

1) THE TOTAL AREA OF THE 10 PARCELS THAT WERE SURVEYED = 2.727 ACRES.

2) ACCORDING TO FEMA FLOOD INSURANCE RATE MAP 45019C 0512 K DATED JANUARY 29, 2021 THIS PROPERTY LIES IN ZONES SHADED X AND AE(10).

3) THIS SURVEY IS NOT INTENDED TO SHOW THE EXISTENCE OR NON EXISTENCE OF U.S. ARMY CORPS OF ENGINEERS "JURISDICTIONAL WETLANDS".

4) THE HORIZONTAL DATUM IS REFERENCED TO NORTH AMERICAN DATUM 1983 (2011 SHIFT). THE VERTICAL DATUM IS REFERENCED TO NORTH AMERICAN VERTICAL DATUM 1988.

6) THE PROPERTY LINES SHOWN ON THIS SURVEY RELIED ON OLD PLATS AND DEEDS, PROPERTY RECORD CARDS AT THE CHARLESTON COUNTY ROD OFFICE, EVIDENCE FOUND ON THE GROUND, AND LINES OF OCCUPATION OF LONG DURATION. NO TITLE SEARCH WAS PERFORMED. ANY EASEMENTS OR ENCUMBRANCES OF RECORD NOT SHOWN ON THE REFERENCES LISTED MAY NOT BE SHOWN ON THIS SURVEY.

7) CONSIDERABLE EFFORT HAS BEEN MADE TO DETERMINE THE LOCATION OF UNDERGROUND UTILITIES. SOME LOCATIONS ARE ACTUAL FIELD MEASUREMENTS AND SOME ARE TAKEN FROM UTILITY RECORDS OR LOCATIONS MARKED IN THE FIELD BY A PROFESSIONAL UTILITY LOCATING SERVICE. THIS SURVEY DOES NOT WARRANT THAT UTILITIES ARE SHOWN ACCURATELY NOR THAT ALL UTILITIES ARE SHOWN. CALL PALMETTO UTILITY PROTECTION SERVICE (PUPS) AT 811 A MINIMUM OF 3 WORKING DAYS BEFORE DIGGING.

8) SHELL COURT IS AN UNOPENED RIGHT OF WAY SHOWN ON VARIOUS PLATS AND THE CHARLESTON COUNTY GIS MAP, BUT THE SURVEYOR WAS UNABLE TO DETERMINE THE OWNER, WIDTH, OR LENGTH OF THE RIGHT OF WAY. THERE WAS ALSO NO EVIDENCE FOUND THAT IT HAS BEEN ABANDONED.

REFERENCES

1) PLAT BY GAILLARD & GAILLARD DATED JUNE 19, 1944 AND RECORDED AT THE CHARLESTON COUNTY ROD OFFICE IN PLAT BOOK F PAGE 183.

2) PLAT BY W.L. GAILLARD DATED AUGUST 22, 1975 AND RECORDED AT THE CHARLESTON COUNTY ROD OFFICE IN PLAT BOOK AF PAGE 20.

3) PLAT BY PENOLIA A. VAN BUREN DATED OCTOBER 28, 1988 AND RECORDED AT THE CHARLESTON COUNTY ROD OFFICE IN PLAT BOOK CD PAGE 168.

4) PLAT BY F. STEVEN JOHNSON DATED FEBRUARY 11, 1998 AND RECORDED AT THE CHARLESTON COUNTY ROD OFFICE IN PLAT BOOK EC PAGE 347.

5) PLAT BY FORSBERG ENGINEERING & SURVEYING, INC. DATED OCTOBER 22, 2014, LAST REVISED DECEMBER 22, 2014 AND RECORDED AT THE CHARLESTON COUNTY ROD OFFICE IN PLAT BOOK L14 PAGE 0525.

6) SURVEY ENTITLED "ALTA/NSPS LAND TITLE SURVEY 106 COMING ST & 99 ST. PHILIP ST." BY FORSBERG ENGINEERING & SURVEYING, INC. DATED AUGUST 1, 2024, LAST REVISED JANUARY 28, 2025. (NOT RECORDED).

LEGEND

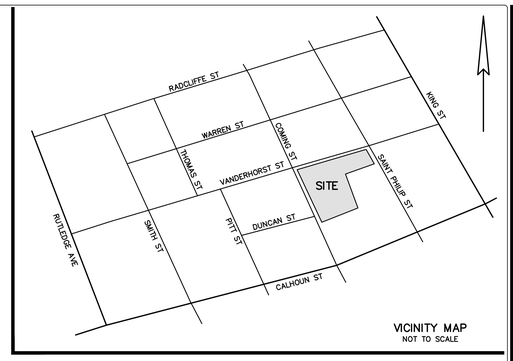
RS – 5/8" REBAR SET
SXCS – SCRIBED "X" SET IN CONCRETE
BC – BUILDING CORNER
WCRN – WALL CORNER
OTPF – OPEN TOP PIPE FOUND
RF – REBAR FOUND
TBM – TEMPORARY BENCHMARK
DI – DROP INLET
CI – CURB INLET
IE – INVERT ELEVATION
SDMH – STORM DRAIN MANHOLE
SSMH – SANITARY SEWER MANHOLE
SSCO – SANITARY SEWER CLEANOUT
VCP – VITRIFIED CLAY PIPE
RCP – REINFORCED CONCRETE PIPE
ERCP – ELLIPTICAL REINFORCED CONCRETE PIPE
PVC – POLYVINYL CHLORIDE PIPE
DIP – DUCTILE IRON PIPE
GV – GAS VALVE
GM – GAS METER
PP – POWER POLE
LP – LIGHT POLE
GUY – GUY WIRE
EHH – ELECTRIC HAND HOLE
EM – ELECTRIC METER
TFM – TRANSFORMER
EMH – ELECTRIC MANHOLE
CHH – COMMUNICATION HAND HOLE
CMH – COMMUNICATION MANHOLE
WV – WATER VALVE
WM – WATER METER
WVT – WATER VAULT
IVB – IRRIGATION VALVE BOX
BFP – BACKFLOW PREVENTER
FH – FIRE HYDRANT
STMH – STEAM LINE MANHOLE
BD – BOLLARD
TSB – TRAFFIC SIGNAL CONTROL BOX
EBP – EMERGENCY BUTTON POLE
CBC – CONCRETE BLOCK COPING
CPV – CONCRETE PAVERS
BPV – BRICK PAVERS
BRC – BRICK COLUMN
CC – CONCRETE COLUMN
WH – WATER HEATER
BF – BRICK FIREPLACE
BPL – BRICK PLANTER
BR – BIKE RACK
MBL – MARBLE
RRT – RAILROAD TIES
x 11.8 – SPOT ELEVATION (PERVIOUS SURFACE)
x 12.37 – SPOT ELEVATION (IMPERVIOUS SURFACE)
x 11.41TC – SPOT ELEVATION (TOP OF CURB)
CM – CREPE MYRTLE
MAG – MAGNOLIA
LUG – LUGUSTRUM

SIGN LEGEND

EXS – ELECTRONIC CROSSWALK SIGN
STS – STOP SIGN
TOW – TOWING SIGN
NPS – NO PARKING SIGN
PS – PARKING SIGN
HCP – HANDICAP PARKING SIGN
OWS – ONE WAY SIGN
CAP – CLEAN UP AFTER PET SIGN
CWS – CHARLESTON WATER SYSTEM SIGN
DNE/STP – DO NOT ENTER/STOP SIGN
EOS – ENTER ONLY SIGN
TLA – TRAFFIC LIGHT AHEAD SIGN
SLS – SPEED LIMIT SIGN
SS – STREET NAME SIGN

LINE LEGEND

– PROPERTY LINE
– ADJACENT PROPERTY LINE
– RIGHT OF WAY LINE
– SCE&G EASEMENT
– CHAIN LINK FENCE
– WOOD FENCE
– METAL FENCE
– OVERHEAD UTILITY LINE
– OVERHEAD TRAFFIC LIGHTS
– CONTOUR LINE
– UNDERGROUND ELECTRIC LINE
– UNDERGROUND COMMUNICATION LINE
– SANITARY SEWER LINE
– WATER LINE
– GAS LINE
– COMMUNICATION DUCT BANK
– ELECTRICAL DUCT BANK
– FEMA FLOOD ZONE LINE



VICINITY MAP
NOT TO SCALE

LOT	TMS NUMBER	OWNER	ACREAGE
1	460-16-03-(MULTIPLE)	COLLEGE OF CHARLESTON	1.031
2	460-16-03-126	J R CLARKIN LLC	0.220
3	460-16-03-125	ROSE MARIE AUGUSTE & PERCY WILLIAMS JR.	0.183
4	460-16-03-028	MIZEN LLC	0.080
5	460-16-03-027	RAMNARINE & JAMELLA JAGLAL	0.031
6	460-16-03-026	120 COMING STREET	0.033
7	460-16-03-025	RONALD EUGENE HORNBECK	0.039
8	460-16-03-024	ALETHIA STEEL, ETAL	0.056
9	460-16-03-018	CAROLINE VON ASTEN & FRANCIS J. IWANICKI	0.139
10	460-16-03-017	COLLEGE OF CHARLESTON	0.900
SHELL COURT	NONE	UNKNOWN	0.016

Know what's **below.**
Call before you dig.

THE SOUTH CAROLINA STATE LAW REQUIRES THAT EXCAVATORS GIVE A 72-HOUR NOTICE, (3) WORKING DAYS EXCLUDING WEEKENDS AND HOLIDAYS), FOR THE LOCATORS TO GET OUT TO MARK THE AREA. AFTER A TICKET HAS BEEN PROCESSED, YOU WILL KNOW WHEN YOU ARE LEGALLY FREE TO PROCEED WITH THE DIGGING WORK AND WHICH UTILITIES IN THE AREA P.U.P.S. WILL BE NOTIFYING FOR YOU. ANY UTILITIES THAT P.U.P.S. DOES NOT NOTIFY, YOU WILL BE RESPONSIBLE FOR NOTIFYING DIRECTLY. THE UTILITY COMPANIES ASK THAT YOU LEAVE A 2 1/2 FEET MARGIN ON EACH SIDE OF A MARKED UTILITY LINE. ALSO NOTE THAT YOUR REQUEST IS GOOD FOR 15 WORKING DAYS AFTER IT HAS BEEN PROCESSED BY OUR SYSTEM.

I HEREBY STATE THAT TO THE BEST OF MY PROFESSIONAL KNOWLEDGE, INFORMATION, AND BELIEF, THE SURVEY SHOWN HEREON WAS MADE IN ACCORDANCE WITH THE REQUIREMENTS OF THE MINIMUM STANDARDS MANUAL FOR THE PRACTICE OF LAND SURVEYING IN SOUTH CAROLINA, AND MEETS OR EXCEEDS THE REQUIREMENTS FOR A CLASS A SURVEY AS SPECIFIED THEREIN.

JEFFREY STEVEN COOPER, S.C. PLS #12516

FORSBERG ENGINEERING AND SURVEYING, INC.
1587 SAVANNAH HIGHWAY SUITE B
P.O. BOX 30575
CHARLESTON, SOUTH CAROLINA 29417
(843) 571-8777 FAX (843) 571-8700
CIVIL ENGINEERING, SURVEYING AND LAND PLANNING

SOUTH CAROLINA CERTIFICATE OF AUTHORIZATION
FORSBERG ENGINEERING & SURVEYING, INC.
No. C00343

TOPOGRAPHIC SURVEY

10 PARCELS
LOCATED ON SAINT PHILIP STREET, VANDERHORST STREET & COMING STREET
CITY OF CHARLESTON, CHARLESTON COUNTY, SOUTH CAROLINA

SOUTH CAROLINA REGISTERED LAND SURVEYOR 12516 JEFFREY STEVEN COOPER

JEFFREY S COOPER

DATE
APRIL 21, 2025

DRAWN/CHECKED
JSC/LSM

LAST REVISED
OCTOBER 14, 2025

APPROVED
JSC

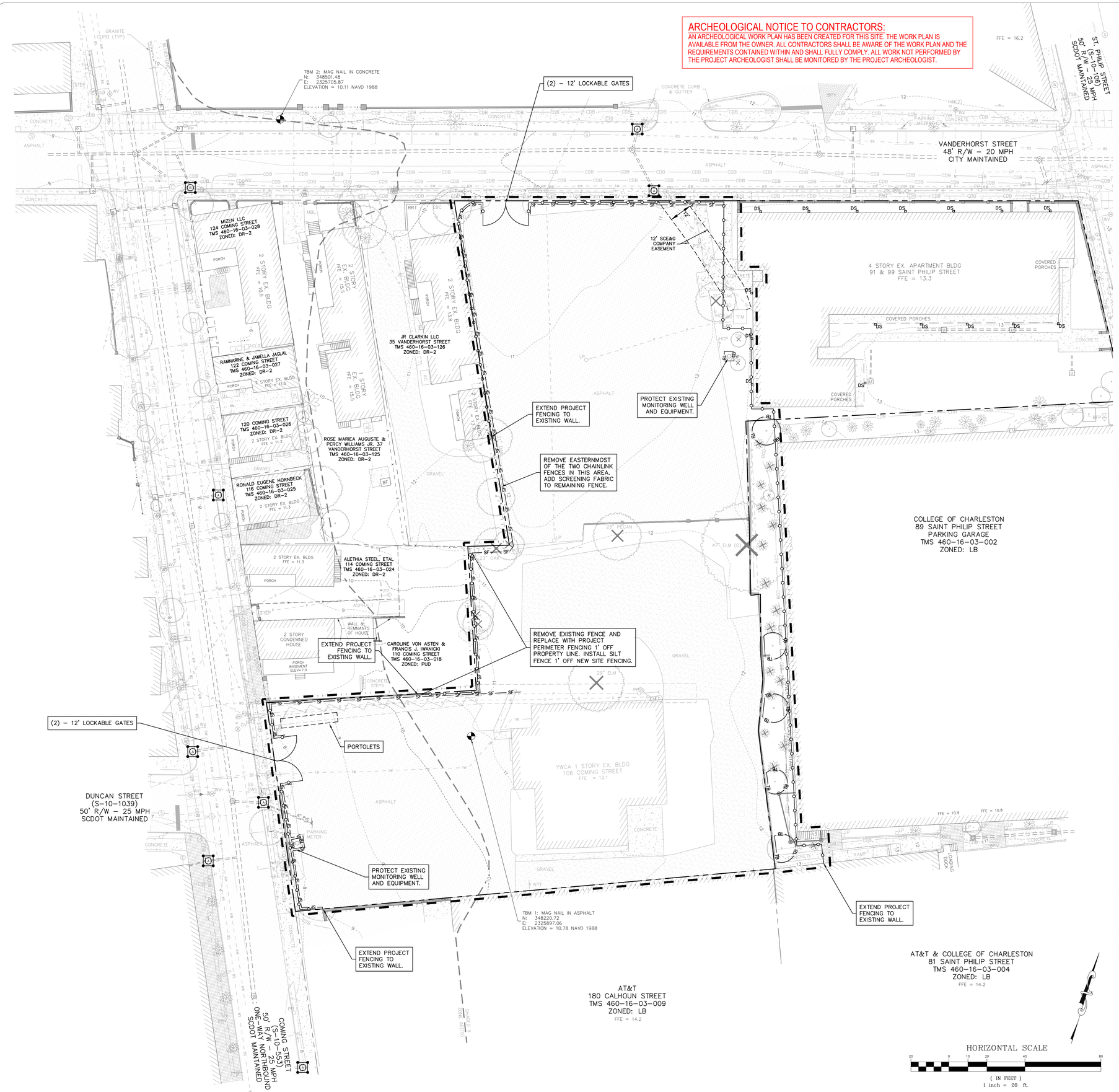
SCALE
N/A

PROJECT NO.
6490

SHEET NUMBER
C-003b
2
OF 2

ARCHEOLOGICAL NOTICE TO CONTRACTORS:

AN ARCHEOLOGICAL WORK PLAN HAS BEEN CREATED FOR THIS SITE. THE WORK PLAN IS AVAILABLE FROM THE OWNER. ALL CONTRACTORS SHALL BE AWARE OF THE WORK PLAN AND THE REQUIREMENTS CONTAINED WITHIN AND SHALL FULLY COMPLY. ALL WORK NOT PERFORMED BY THE PROJECT ARCHEOLOGIST SHALL BE MONITORED BY THE PROJECT ARCHEOLOGIST.



GENERAL NOTES:

1. SEE SHEETS C001 & C002 FOR CIVIL NOTES AND ABBREVIATIONS.
2. HORIZONTAL COORDINATES ARE BASED ON SC STATE PLANE COORDINATES NAD '83. VERTICAL DATUM IS BASED ON NAVD 88.
3. CONTRACTOR IS RESPONSIBLE FOR ALL WORK SHOWN, UNLESS SPECIFICALLY INDICATED OTHERWISE.
4. CONTRACTOR SHALL VISIT THE SITE PRIOR TO BIDDING TO DETERMINE THE EXTENT OF THE PROJECT.
5. CONTRACTOR SHALL CONTACT PALMETTO UTILITY LOCATION SERVICE AT 1-888-721-7877 PRIOR TO ANY WORK. CONTRACTOR IS RESPONSIBLE FOR FIELD LOCATING AND PROTECTING ALL UTILITIES. CONTACT THE ENGINEER IN THE EVENT THAT UTILITIES CONFLICT WITH NEW FACILITIES.
6. ALL PROJECT STAKEOUT SHALL BE PERFORMED BY A REGISTERED LAND SURVEYOR TO BE PAID FOR BY THE CONTRACTOR. FOR STAKEOUT, DO NOT RELY SOLELY ON THE PHYSICAL SCALE AS SHOWN IN DRAWINGS. REFER TO THE GIVEN DIMENSIONS, SYMBOL LEGEND, KEYNOTES, AND REFERENCED DETAILS FOR CORRECT STAKEOUT.
7. ALL CONTRACTORS/SUBCONTRACTORS/PERSON THAT WILL BE ENGAGED IN LAND DISTURBING ACTIVITIES SHALL COMPLY WITH ALL EROSION CONTROL AND STORMWATER POLLUTION PREVENTION REQUIREMENTS CONTAINED THROUGHOUT THE DRAWINGS, SPECIFICATIONS AND PERMITS.

LEGEND:

- TS — TEMPORARY SEEDING – INSTALL IAW DETAIL C/C610.
- SF — SILT FENCE – INSTALL IAW DETAIL B/C610.
- TB — TREE BARRICADE – INSTALL IAW DETAIL D/C610.
- CE — CONSTRUCTION ENTRANCE – INSTALL IAW DETAIL A/C610.
- A — CURB INLET PROTECTION – INSTALL IAW DETAIL A/C611.
- B — FILTER SACK INLET PROTECTION – INSTALL IAW DETAIL B/C611.
- PROJECT PERIMETER FENCING – 6' CHAIN LINK CONSTRUCTION FENCE IAW SPECIFICATION SECTION 015000.
- DRAINAGE FLOW ARROW.
- WEIGHTED SEDIMENT TUBE – INSTALL IAW DETAIL C/C611.
- LIMITS OF DISTURBANCE / CONSTRUCTION.

LAND DISTURBANCE / SWPPP SEQUENCE OF CONSTRUCTION NOTES:

INITIAL PHASE:

1. PRIOR TO ANY LAND DISTURBANCE ACTIVITY, CONDUCT A SWPPP PRE-CONSTRUCTION CONFERENCE. GENERAL CONTRACTOR SHALL SCHEDULE AND CONDUCT SWPPP PRE-CONSTRUCTION MEETING WITH SWPPP PREPARING ENGINEER, CITY OF CHARLESTON, SCDES, SHPO, PROJECT ARCHEOLOGIST, OWNER, AND ALL LAND DISTURBING CONTRACTORS BEFORE PROCEEDING WITH CONSTRUCTION.
2. ALL WORK SHALL BE MONITORED BY THE PROJECT ARCHEOLOGIST.
3. INSTALL PERIMETER FENCING, LOCKABLE GATES, AND TREE BARRICADES. BY CONTRACTOR.
4. CONDUCT LIMITED CLEARING AND DEMOLITION ONLY AS REQUIRED TO INSTALL PERIMETER BEST MANAGEMENT PRACTICES. BY CONTRACTOR.
5. INSTALL PERIMETER BMP'S INCLUDING SILT FENCE, INLET PROTECTION, PORTOLETS, AND WEIGHTED SEDIMENT TUBES AS SHOWN ON THE PLANS. ASPHALT PAVEMENT TO REMAIN IN THIS PHASE AT THE CONSTRUCTION ENTRANCES. BY CONTRACTOR.
6. TEMPORARILY SEED DISTURBED AREAS IAW THE PLANS, DETAILS, AND THE CONSTRUCTION GENERAL PERMIT. BY CONTRACTOR DURING THIS PHASE.
7. MAINTAIN BEST MANAGEMENT PRACTICES THROUGHOUT THIS PROJECT. BY CONTRACTOR DURING THIS PHASE.
8. COMPLETE INSPECTION REPORTS IAW THE CONSTRUCTION GENERAL PERMIT. BY 3RD PARTY INSPECTOR.

DEMOLITION PHASE:

1. ALL WORK SHALL BE MONITORED BY THE PROJECT ARCHEOLOGIST.
2. DEMOLISH EXISTING TREES IAW DEMOLITION PLAN. TREES SHALL BE CUT TO STUMP ONLY IN THIS PHASE. BY CONTRACTOR.
3. CUT AND CAP EXISTING UTILITIES IAW DEMOLITION PLANS. REMOVE OTHER UTILITIES IAW DEMOLITION PLANS. BY CONTRACTOR.
4. DEMOLISH EXISTING BUILDINGS, BUILDING FOUNDATIONS, SITE PAVING, WALLS, AND FENCES IAW DEMOLITON PLANS. NO DEMOLITION TO OCCUR WITHIN RIGHT-OF-WAY. BY CONTRACTOR.
5. TEMPORARILY SEED DISTURBED AREAS IAW THE PLANS, DETAILS, AND THE CONSTRUCTION GENERAL PERMIT. BY CONTRACTOR DURING THIS PHASE.
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ARCHEOLOGICAL PHASE:

1. PERFORM GROUND PENETRATING RADAR INVESTIGATION. BY ARCHEOLOGIST.
2. PERFORM ARCHEOLOGICAL INVESTIGATIONS/WORK PER THE APPROVED WORK PLANS IN THE AREAS OF THE CONSTRUCTION ENTRANCES AND THE DEWATERING BASIN. BY ARCHEOLOGIST.
3. INSTALL REMAINING BMP'S INCLUDING CONSTRUCTION ENTRANCES AND DEWATERING BASIN. BY CONTRACTOR.
4. PERFORM REMAINING ARCHEOLOGICAL INVESTIGATIONS/WORK PER THE APPROVED WORK PLANS. ROUTE DEWATERING PUMPS THROUGH DEWATERING BASIN AS INDICATED. BY ARCHEOLOGIST.
5. BACKFILL AND COMPACT EXCAVATED AREAS AS INVESTIGATIONS ARE COMPLETED IN EACH AREA. REMOVE WASTE MATERIALS AND ORGANICS (TREE STUMPS, ROOTS, ETC.) FROM THE SITE. STOCKPILE UNSUITABLE SOILS FOR FUTURE REMOVAL UNDER SEPARATE CONTRACT. BY ARCHEOLOGIST.
6. TEMPORARILY SEED DISTURBED AREAS IAW THE PLANS, DETAILS, AND THE CONSTRUCTION GENERAL PERMIT. BY SEPERATE CONTRACTOR CONTRACTED SEPARATELY THROUGH THE OWNER DURING THIS PHASE.
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8. COMPLETE INSPECTION REPORTS IAW THE CONSTRUCTION GENERAL PERMIT. BY 3RD PARTY INSPECTOR.

FINAL PHASE:

1. INSTALL TEST PILES. BY CMAR CONTRACTOR.
2. MASS GRADE SITE AS REQUIRED TO SHEET FLOW OFF-SITE TO COMING ST. AND VANDERHORST ST. BY CMAR CONTRACTOR.
3. TEMPORARILY SEED DISTURBED AREAS IAW THE PLANS, DETAILS, AND THE CONSTRUCTION GENERAL PERMIT. BY CMAR CONTRACTOR DURING THIS PHASE.
4. SCHEDULE AN ONSITE INSPECTION WITH THE CITY OF CHARLESTON, THE ENGINEER, AND THE OWNER AFTER THE SITE IS TEMPORARILY STABILIZED AND PRIOR TO COMMENCEMENT OF CONSTRUCTION PHASE WORK UNDER SEPARATE PERMIT. BY CMAR CONTRACTOR.
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ADC ENGINEERING
1226 YEAMANS HALL ROAD
HANAHAN, SC 29410
843-566-0161
ADCENGINEERING.COM
ADC PROJECT #25039

SC811

SOUTH CAROLINA PROFESSIONAL ENGINEER No. 14581 CHRISTOPHER B. COX 3/16/26

SOUTH CAROLINA ADC ENGINEERING, INC. No. 002513 CERTIFICATE OF AUTHORIZATION

△	Revision Date	Description

EARLY SITE PACKAGE

106 COMING STREET

COLLEGE of CHARLESTON 1770

PROJECT 205 NEW CONSTRUCTION

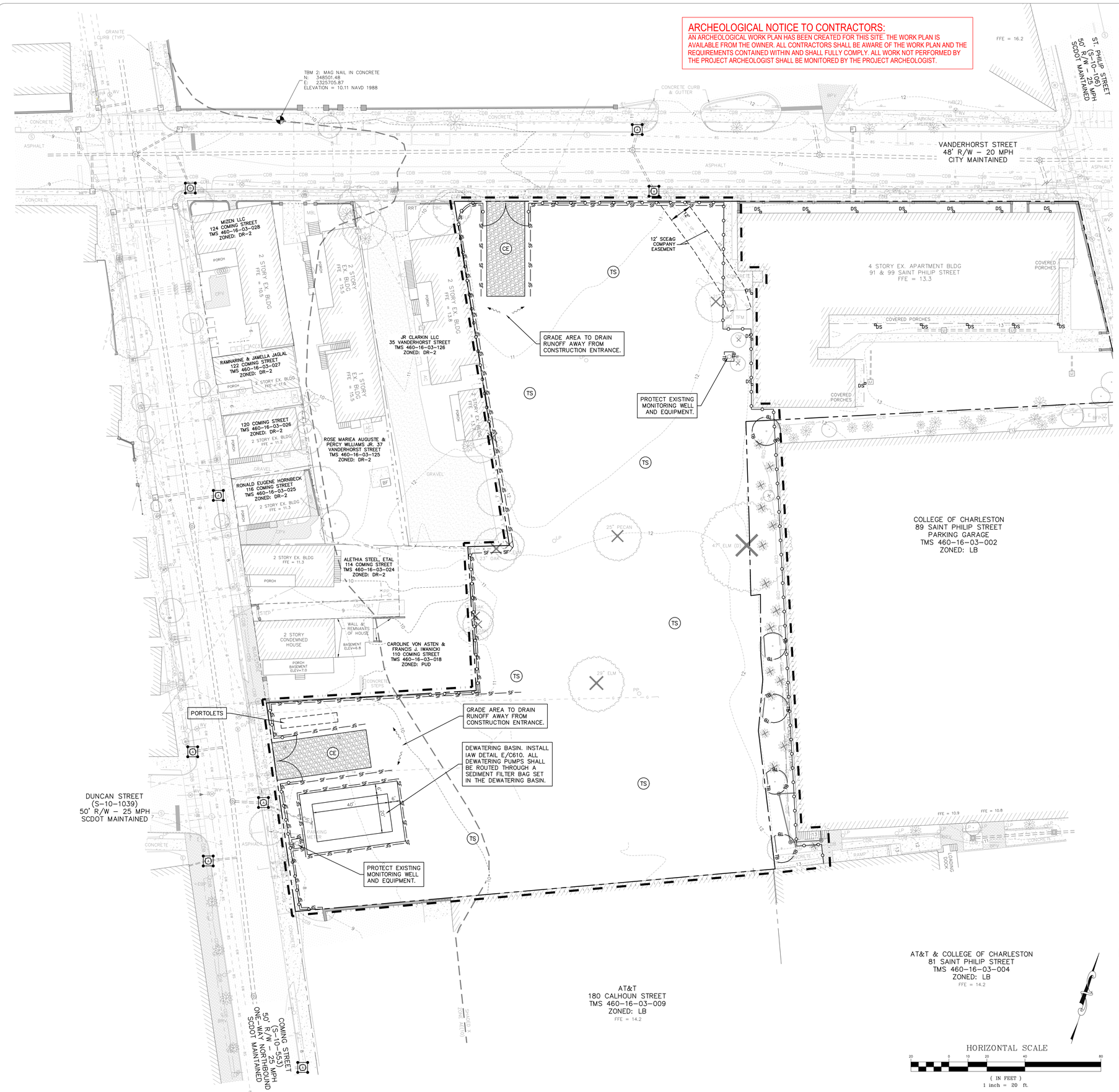
State Project Number:	H15-9689-PD
Project Number:	25700
Checked By:	CBC / GFJ
Drawn By:	ARW
Date:	03/16/26
Scale:	1" = 20'

C100
SWPPP & EROSION CONTROL - INITIAL PHASE

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ADC ENGINEERING
1226 YEAMANS HALL ROAD
HANAHAN, SC 29410
843-566-0161
ADCENGINEERING.COM
ADC PROJECT #25039

SC811

SOUTH CAROLINA — No. 14561 — 3/16/26 — CHRISTOPHER B. CONN

SOUTH CAROLINA — ADC ENGINEERING INC — No. 00253 — CERTIFICATE OF AUTHORIZATION

△	Revision Date	Description

EARLY SITE PACKAGE

106 COMING STREET

COLLEGE of CHARLESTON 1770

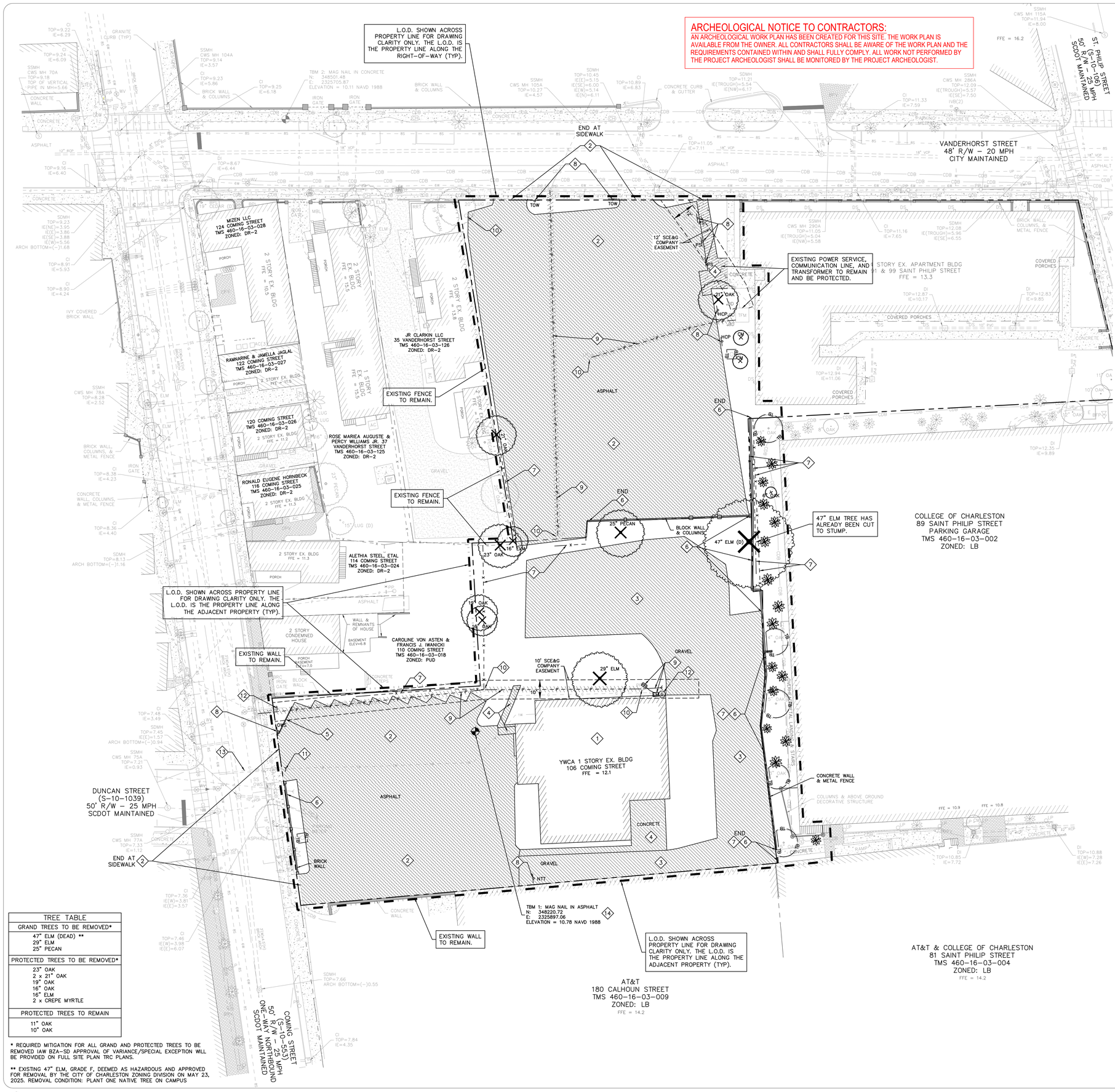
PROJECT 205 NEW CONSTRUCTION

State Project Number:	H15-9689-PD
Project Number:	25700
Checked By:	CBC / GFJ
Drawn By:	ARW
Date:	03/16/26
Scale:	1" = 20'

C101

SWPPP & EROSION CONTROL - DEMO & ARCHEOLOGICAL PHASE

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TREE TABLE
GRAND TREES TO BE REMOVED*
47" ELM (DEAD) ** 29" ELM 25" PECAN
PROTECTED TREES TO BE REMOVED*
23" OAK 2 x 21" OAK 19" OAK 16" OAK 16" ELM 2 x CREPE MYRTLE
PROTECTED TREES TO REMAIN
11" OAK 10" OAK

* REQUIRED MITIGATION FOR ALL GRAND AND PROTECTED TREES TO BE REMOVED IAW BZA-SD APPROVAL OF VARIANCE/SPECIAL EXCEPTION WILL BE PROVIDED ON FULL SITE PLAN TRC PLANS.

** EXISTING 47" ELM, GRADE F, DEEMED AS HAZARDOUS AND APPROVED FOR REMOVAL BY THE CITY OF CHARLESTON ZONING DIVISION ON MAY 23, 2025. REMOVAL CONDITION: PLANT ONE NATIVE TREE ON CAMPUS

GENERAL NOTES:

1. SEE SHEETS C001 & C002 FOR CIVIL NOTES AND ABBREVIATIONS.
2. HORIZONTAL COORDINATES ARE BASED ON SC STATE PLANE COORDINATES NAD '83. VERTICAL DATUM IS BASED ON NAVD 88.
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KEYNOTES: ◇

1. DEMOLISH BUILDING AND STRUCTURES.
2. DEMOLISH ASPHALT PARKING AREA TO LIMITS SHOWN.
3. DEMOLISH GRAVEL PARKING AREA TO LIMITS SHOWN.
4. REMOVE EXISTING CONCRETE SIDEWALK TO THE LIMITS SHOWN. REMOVAL SHALL BE TO THE NEXT NEAREST JOINT.
5. REMOVE EXISTING CONCRETE CURB TO LIMITS SHOWN. REMOVAL SHALL BE TO THE NEXT NEAREST JOINT.
6. REMOVE EXISTING WALL INCLUDING FOUNDATIONS.
7. REMOVE EXISTING FENCING.
8. REMOVE EXISTING SIGN.
9. REMOVE ELECTRICAL LINES & UTILITIES IAW ELECTRICAL PLANS.
10. CUT EXISTING ELECTRICAL/LIGHT POLES TO GRADE.
11. CUT AND CAP EXISTING 1" WATER SERVICE LINE AT PROPERTY LINE. COORDINATE WITH CWS FOR INSPECTION. REMOVE EXISTING WATER METER AND RETURN TO CHARLESTON WATER SYSTEM.
12. COORDINATE WITH DOMINION GAS TO CUT AND CAP EXISTING GAS LINE AT PROPERTY LINE AND TO REMOVE EXISTING GAS REGULATOR.
13. CUT AND CAP EXISTING SEWER PIPING AT PROPERTY LINE. COORDINATE WITH CWS FOR INSPECTION.
14. RELOCATE EXISTING PROJECT BENCHMARK PRIOR TO ASPHALT REMOVAL. BY SC LICENSED SURVEYOR.

EXISTING SITE LEGEND

- WATER LINE W/ VALVE
- WATER SERVICE
- SANITARY SEWER PIPE
- SANITARY SEWER SERVICE
- STORM DRAIN
- PERFORATED STORM DRAIN
- POWER LINE (OVERHEAD)
- POWER LINE (UNDERGROUND)
- ELECTRICAL DUCT BANK
- COMMUNICATIONS DUCT BANK
- COMMUNICATIONS LINE (UNDERGROUND)
- GAS LINE
- STEAM LINE
- EXISTING TREE
- POWER POLE, GUY WIRE
- ELECTRICAL BOX, HAND HOLE
- LIGHT POLE
- SANITARY MANHOLE
- SEWER CLEANOUT
- CATCH BASIN
- FIRE HYDRANT
- FIRE DEPARTMENT CONNECTION
- POST INDICATOR VALVE
- IRRIGATION VALVE
- WATER VAULT, MANHOLE
- COMMUNICATION MANHOLE, VAULT
- COMMUNICATION HANDHOLE, PEDESTAL
- AIR CONDITION UNIT
- GAS METER, VALVE
- FENCE
- SIGN
- CONTOUR
- SPOT ELEVATION
- PROPERTY LINE
- LIMITS OF CONSTRUCTION/DISTURBANCE

EXISTING DEMO LEGEND

- ITEMS TO BE DEMOLISHED.
- TREE TO BE REMOVED. CUT TO THE STUMP ONLY.
- TREE BARRICADE - INSTALL IAW DETAIL D/C610.

HORIZONTAL SCALE
20 0 10 20 40 80
(IN FEET)
1 inch = 20 ft.

ADC ENGINEERING
1226 YEAMANS HALL ROAD
HANAHAN, SC 29410
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ADCENGINEERING.COM
ADC PROJECT #25039

SC811

SOUTH CAROLINA PROFESSIONAL ENGINEER No. 14561 CHRISTOPHER B. CONN 3/16/26

SOUTH CAROLINA ADC ENGINEERING INC. No. 0025.3 CERTIFICATE OF AUTHORIZATION

△ Revision Date Description

EARLY SITE PACKAGE

106 COMING STREET

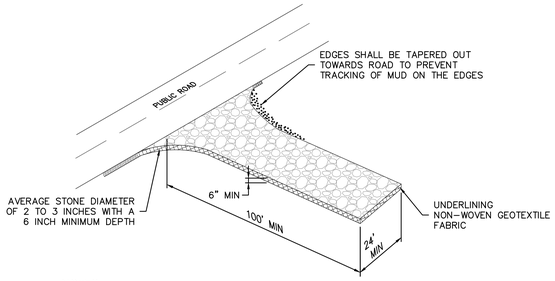
COLLEGE of CHARLESTON 1770

PROJECT 205 NEW CONSTRUCTION

State Project Number:	H15-9689-PD
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Checked By:	CBC / GFJ
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Date:	03/16/26
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C110 EXISTING CONDITIONS & DEMOLITION PLAN

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NOTES:

1. INSTALL A CULVERT PIPE ACROSS THE ENTRANCE WHEN NEEDED TO PROVIDE POSITIVE DRAINAGE.
2. DIVERT ALL SURFACE RUNOFF AND DRAINAGE FROM THE STONE PAD TO A SEDIMENT TRAP OR BASIN OR OTHER SEDIMENT TRAPPING STRUCTURE.

INSPECTION AND MAINTENANCE:

1. THE KEY TO FUNCTIONAL CONSTRUCTION ENTRANCES IS WEEKLY INSPECTIONS, ROUTINE MAINTENANCE, AND REGULAR SEDIMENT REMOVAL.
2. REGULAR INSPECTIONS OF CONSTRUCTION ENTRANCES SHALL BE CONDUCTED ONCE EVERY CALENDAR WEEK AND, AS RECOMMENDED, WITHIN 24-HOURS AFTER EACH RAINFALL EVENT THAT PRODUCES 1/2-INCH OR MORE OF PRECIPITATION.
3. DURING REGULAR INSPECTIONS, CHECK FOR MUD AND SEDIMENT BUILDUP AND PAD INTEGRITY. INSPECTION FREQUENCIES MAY NEED TO BE MORE FREQUENT DURING LONG PERIODS OF WET WEATHER.
4. RESHAPE THE STONE PAD AS NECESSARY FOR DRAINAGE AND RUNOFF CONTROL.
5. WASH OR REPLACE STONES AS NEEDED AND AS DIRECTED BY SITE INSPECTOR. THE STONE IN THE ENTRANCE SHOULD BE WASHED OR REPLACED WHENEVER THE ENTRANCE FAILS TO REDUCE THE AMOUNT OF MUD BEING CARRIED OFF-SITE BY VEHICLES. FREQUENT WASHING WILL EXTEND THE USEFUL LIFE OF STONE PAD.
6. IMMEDIATELY REMOVE MUD AND SEDIMENT TRACKED OR WASHED ONTO ADJACENT IMPERVIOUS SURFACES BY BRUSHING OR SWEEPING. FLUSHING SHOULD ONLY BE USED WHEN THE WATER CAN BE DISCHARGED TO A SEDIMENT TRAP OR BASIN.
7. DURING MAINTENANCE ACTIVITIES, ANY BROKEN PAVEMENT SHOULD BE REPAIRED IMMEDIATELY.
8. CONSTRUCTION ENTRANCES SHOULD BE REMOVED AFTER THE SITE HAS REACHED FINAL STABILIZATION. PERMANENT VEGETATION SHOULD REPLACE AREAS FROM WHICH CONSTRUCTION ENTRANCES HAVE BEEN REMOVED, UNLESS AREA WILL BE CONVERTED TO AN IMPERVIOUS SURFACE TO SERVE POST-CONSTRUCTION.

GENERAL NOTES:

1. STABILIZED CONSTRUCTION ENTRANCES SHOULD BE USED AT ALL POINTS WHERE TRAFFIC WILL EGRESS/INGRESS A CONSTRUCTION SITE ONTO A PUBLIC ROAD OR ANY IMPERVIOUS SURFACES, SUCH AS PARKING LOTS.
2. INSTALL A NON-WOVEN GEOTEXTILE FABRIC PRIOR TO PLACING ANY STONE.
3. INSTALL A CULVERT PIPE ACROSS THE ENTRANCE WHEN NEEDED TO PROVIDE POSITIVE DRAINAGE.
4. THE ENTRANCE SHALL CONSIST OF 2-INCH TO 3-INCH D50 STONE PLACED AT A MINIMUM DEPTH OF 6-INCHES.
5. MINIMUM DIMENSIONS OF THE ENTRANCE SHALL BE 24-FEET WIDE BY 100-FEET LONG, AND MAY BE MODIFIED AS NECESSARY TO ACCOMMODATE SITE CONSTRAINTS.
6. THE EDGES OF THE ENTRANCE SHALL BE TAPERED OUT TOWARDS THE ROAD TO PREVENT TRACKING AT THE EDGE OF THE ENTRANCE.
7. DIVERT ALL SURFACE RUNOFF AND DRAINAGE FROM THE STONE PAD TO A SEDIMENT TRAP OR BASIN OR OTHER SEDIMENT TRAPPING STRUCTURE.
8. LIMESTONE MAY NOT BE USED FOR THE STONE PAD.

CE A SCDES STABILIZED CONSTRUCTION ENTRANCE
NOT TO SCALE

NOTES:

1. THE GENERAL CONTRACTOR IS REQUIRED TO, AT A MINIMUM, INITIATE SOIL STABILIZATION MEASURES IMMEDIATELY WHENEVER ANY CLEARING, GRADING, EXCAVATING OR OTHER EARTH DISTURBING ACTIVITIES HAVE PERMANENTLY CEASED ON ANY PORTION OF THE SITE, OR TEMPORARILY CEASED ON ANY PORTION OF THE SITE AND WILL NOT LIKELY RESUME FOR A PERIOD EXCEEDING 14 CALENDAR DAYS. DIVERSION CHANNELS/DITCHES SHALL BE STABILIZED WITHIN 7 DAYS OF INSTALLATION.
2. THE GENERAL CONTRACTOR HAS 7 DAYS FROM INITIATION OF STABILIZATION TO COMPLETE SOIL PREPARATION, SEEDING, MULCHING, AND ANY OTHER REQUIRED ACTIVITIES RELATED TO THE PLANTING AND ESTABLISHMENT OF VEGETATION. THE GENERAL CONTRACTOR ALSO HAS 7 DAYS FROM INITIATION OF STABILIZATION TO COMPLETELY INSTALL NON-VEGETATED MEASURES, IF UTILIZED.
3. ALL DISTURBED AREAS MUST BE STABILIZED TEMPORARILY WITH THE USE OF FAST-GERMINATING ANNUAL GRASS/GRAIN VARIETIES APPROPRIATE FOR SITE SOIL AND CLIMATE CONDITIONS. MULCH IS REQUIRED FOR ALL SEEDING APPLICATIONS, AND ALL MULCH APPLICATIONS MUST INCLUDE A SUITABLE FORM OF MULCH ANCHORING TO MINIMIZE MOVEMENT OF MULCH BY WIND OR WATER.

SEEDING PREPARATION:
A. TILL AREA TO BE SEEDED TO A DEPTH OF 4".
B. APPLY 10-10-10 FERTILIZER AT A RATE OF 11.5 POUNDS PER 1,000 SQUARE FEET.
C. THE FERTILIZER SHALL BE WORKED INTO THE TOP 4 INCHES OF SOIL PRIOR TO SEEDING.

STRAW MULCH:
A. APPLY STRAW MULCH BY HAND OR MACHINE AT A RATE OF 1.5-2.0 TONS PER ACRE (90 POUNDS PER 1,000 SF) THEN TACKED WITH EMULSIFIED ASPHALT.

4. ALTERNATIVE STABILIZATION MEASURES TO SEEDING, SUCH AS ANCHORED MULCH APPLICATION (WITHOUT SEEDING), MAY BE UTILIZED DURING PERIODS WHEN VEGETATIVE GROWTH IS UNLIKELY (E.G. WINTER MONTHS).
5. IT IS NOT ACCEPTABLE TO ALLOW BARE SOIL TO REMAIN EXPOSED AT ANY TIME DURING THE YEAR, REGARDLESS OF WEATHER/TEMPERATURE/SITE CONDITIONS.
6. ALTERNATIVE STABILIZATION MEASURES INCLUDE, BUT ARE NOT LIMITED TO: ANCHORED STRAW/HAY MULCH, WOOD CELLULOSE FIBER MULCH, SPRAY-ON SOIL GLUES/BINDERS, AND ROLLED EROSION CONTROL PRODUCTS.
7. ALL ROLLED EROSION CONTROL PRODUCTS SHALL HAVE CURRENT QDOR(TM) STATUS ISSUED BY THE EROSION CONTROL TECHNOLOGY COUNCIL (ECTC) PLUS ANY STATE OR AGENCY-SPECIFIC REQUIREMENTS. EVIDENCE OF QDOR(TM) APPROVAL SHALL ACCOMPANY THE PRODUCT SHIPPED TO THE JOBSITE FOR READY IDENTIFICATION BY THE CONTRACTOR OR AGENCY INSPECTOR.
8. ROLLED EROSION CONTROL PRODUCTS (NETS, BLANKETS, TURF REINFORCED MATES) AND VEGETATED AREAS NOT MEETING REQUIRED VEGETATIVE DENSITIES FOR FINAL STABILIZATION MUST BE INSPECTED DAILY. RILLING, RUTTING AND OTHER SIGNS OF EROSION INDICATE THE SPECIFIED EROSION CONTROL DEVICE IS NOT FUNCTIONING OR INSTALLED PROPERLY AND/OR ADDITIONAL EROSION CONTROL DEVICES ARE WARRANTED.

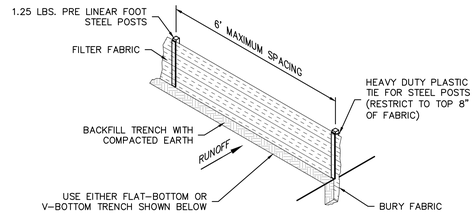
SCDES PERMANENT SEEDING – COASTAL

SPECIES	LBS/AC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
SANDY, DROUGHTY SITES													
BROWNTOP MILLET BAHIAGRASS	10 40												
BROWNTOP MILLET BAHIAGRASS SERICEA LESPEDEZA	10 30 40												
BROWNTOP MILLET ATLANTIC COASTAL PANIC GRASS	10 15 PLS												
BROWNTOP MILLET SWITCHGRASS CLAIMED LITTLE BLUESTEM SERICEA LESPEDEZA	10 8 PLS 3 20												
BROWNTOP MILLET WEEPING LOVEGRASS	10 8												
WELL DRAINED, CLAYEY/LOAMEY SITES													
BROWNTOP MILLET BAHIAGRASS	10 40												
RYE, GRAIN BAHIAGRASS CLOVER,CRIMSON (ANNUAL)	10 40 5												
BROWNTOP MILLET BAHIAGRASS SERICEA LESPEDEZA	10 30 40												
BROWNTOP MILLET BERMUDA, COMMON SERICEA LESPEDEZA	10 10 40												
BROWNTOP MILLET BERMUDA, COMMON KOBE LESPEDEZA (ANNUAL)	10 12 10												
BROWNTOP MILLET BAHIAGRASS BERMUDA, COMMON SERICEA LESPEDEZA	10 20 6 40												
BROWNTOP MILLETSWITCHGRASS LITTLE BLUESTEM INDIANGRASS	10 PLS 3 PLS 3 PLS												

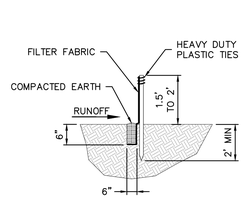
SCDES TEMPORARY SEEDING – COASTAL

SPECIES	LBS/AC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
SANDY, DROUGHTY SITES													
BROWNTOP MILLET	40												
RYE, GRAIN	56												
RYEGRASS	50												
WELL DRAINED, CLAYEY/LOAMEY SITES													
BROWNTOP MILLET OR JAPANESE MILLET	40												
RYE, GRAIN OR OATS	56 75												
RYEGRASS	50												

TS PS C SCDES TEMPORARY AND PERMANENT SEEDING/VEGETATION NOTES
NOT TO SCALE



SILT FENCE INSTALLATION



FLAT-BOTTOM TRENCH DETAIL

GENERAL NOTES:

1. DO NOT PLACE SILT FENCE ACROSS CHANNELS OR IN OTHER AREAS SUBJECT TO CONCENTRATED FLOWS. SILT FENCE SHOULD NOT BE USED AS A VELOCITY CONTROL BMP. CONCENTRATED FLOWS ARE ANY FLOWS GREATER THAN 0.5 CFS.
2. MAXIMUM SHEET OR OVERLAND FLOW PATH LENGTH TO THE SILT FENCE SHALL BE 100-FEET.
3. MAXIMUM SLOPE STEEPNESS (NORMAL [PERPENDICULAR] TO THE FENCE LINE) SHALL BE 2:1.
4. SILT FENCE JOINTS, WHEN NECESSARY, SHALL BE COMPLETED BY ONE OF THE FOLLOWING OPTIONS:
   - WRAP EACH FABRIC TOGETHER AT A SUPPORT POST WITH BOTH ENDS FASTENED TO THE POST, WITH A 1-FOOT MINIMUM OVERLAP;
   - OVERLAP SILT FENCE BY INSTALLING 3-FEET PASSED THE SUPPORT POST TO WHICH THE NEW SILT FENCE ROLL IS ATTACHED. ATTACH OLD ROLL TO NEW ROLL WITH HEAVY-DUTY PLASTIC TIES; OR,
   - OVERLAP ENTIRE WIDTH OF EACH SILT FENCE ROLL FROM ONE SUPPORT POST TO THE NEXT SUPPORT POST.
5. ATTACH FILTER FABRIC TO THE STEEL POSTS USING HEAVY-DUTY PLASTIC TIES THAT ARE EVENLY SPACED WITHIN THE TOP 8-INCHES OF THE FABRIC.
6. INSTALL THE SILT FENCE PERPENDICULAR TO THE DIRECTION OF THE STORMWATER FLOW AND PLACE THE SILT FENCE THE PROPER DISTANCE FROM THE TOE OF STEEP SLOPES TO PROVIDE SEDIMENT STORAGE AND ACCESS FOR MAINTENANCE AND CLEANOUT.
7. INSTALL SILT FENCE CHECKS (TIE-BACKS) EVERY 50-100 FEET, DEPENDENT ON SLOPE, ALONG SILT FENCE THAT IS INSTALLED WITH SLOPE AND WHERE CONCENTRATED FLOWS ARE EXPECTED OR ARE DOCUMENTED ALONG THE PROPOSED/INSTALLED SILT FENCE.

FABRIC REQUIREMENTS:

1. SILT FENCE MUST BE COMPOSED OF WOVEN GEOTEXTILE FILTER FABRIC THAT CONSISTS OF THE FOLLOWING REQUIREMENTS:
   - COMPOSED OF FIBERS CONSISTING OF LONG CHAIN SYNTHETIC POLYMERS OF AT LEAST 85% BY WEIGHT OF POLYOLEFINS, POLYESTERS, OR POLYAMIDES THAT ARE FORMED INTO A NETWORK SUCH THAT THE FILAMENTS OR YARNS RETAIN DIMENSIONAL STABILITY RELATIVE TO EACH OTHER;
   - FREE OF ANY TREATMENT OR COATING WHICH MIGHT ADVERSELY ALTER ITS PHYSICAL PROPERTIES AFTER INSTALLATION;
   - FREE OF ANY DEFECTS OR FLAWS THAT SIGNIFICANTLY AFFECT ITS PHYSICAL AND/OR FILTERING PROPERTIES; AND,
   - HAVE A MINIMUM WIDTH OF 36-INCHES.
2. USE ONLY FABRIC APPEARING ON SC DOT'S QUALIFIED PRODUCTS LISTING (QPL), APPROVAL SHEET #34, MEETING THE REQUIREMENTS OF THE MOST CURRENT EDITION OF THE SC DOT STANDARD SPECIFICATIONS FOR HIGHWAY CONSTRUCTION.
3. 12-INCHES OF THE FABRIC SHOULD BE PLACED WITHIN EXCAVATED TRENCH AND TOED IN WHEN THE TRENCH IS BACKFILLED.
4. FILTER FABRIC SHALL BE PURCHASED IN CONTINUOUS ROLLS AND CUT TO THE LENGTH OF THE BARRIER TO AVOID JOINTS.
5. FILTER FABRIC SHALL BE INSTALLED AT A MINIMUM OF 24-INCHES ABOVE THE GROUND.

POST REQUIREMENTS:

1. SILT FENCE POSTS MUST BE 48-INCH LONG STEEL POSTS THAT MEET, AT A MINIMUM, THE FOLLOWING PHYSICAL CHARACTERISTICS.
   - COMPOSED OF A HIGH STRENGTH STEEL WITH A MINIMUM YIELD STRENGTH OF 50,000 PSI.
   - INCLUDE A STANDARD "T" SECTION WITH A NOMINAL FACE WIDTH OF 1.38-INCHES AND A NOMINAL "T" LENGTH OF 1.48-INCHES.
   - WEIGH 1.25 POUNDS PER FOOT (± 8%)
2. POSTS SHALL BE EQUIPPED WITH PROJECTIONS TO AID IN FASTENING OF FILTER FABRIC.
3. STEEL POSTS MAY NEED TO HAVE A METAL SOIL STABILIZATION PLATE WELDED NEAR THE BOTTOM WHEN INSTALLED ALONG STEEP SLOPES OR INSTALLED IN LOOSE SOILS. THE PLATE SHOULD HAVE A MINIMUM CROSS SECTION OF 17-SQUARE INCHES AND BE COMPOSED OF 15 GAUGE STEEL, AT A MINIMUM. THE METAL SOIL STABILIZATION PLATE SHOULD BE COMPLETELY BURIED.
4. INSTALL POSTS TO A MINIMUM OF 24-INCHES. A MINIMUM HEIGHT OF 1- TO 2- INCHES ABOVE THE FABRIC SHALL BE MAINTAINED, AND A MAXIMUM HEIGHT OF 3 FEET SHALL BE MAINTAINED ABOVE THE GROUND.
5. POST SPACING SHALL BE AT A MAXIMUM OF 6-FEET ON CENTER.

INSPECTION AND MAINTENANCE:

THE KEY TO FUNCTIONAL SILT FENCE IS WEEKLY INSPECTIONS, ROUTINE MAINTENANCE, AND REGULAR SEDIMENT REMOVAL.

REGULAR INSPECTIONS OF SILT FENCE SHALL BE CONDUCTED ONCE EVERY CALENDAR WEEK AND, AS RECOMMENDED, WITHIN 24-HOURS AFTER EACH RAINFALL EVEN THAT PRODUCES 1/2-INCH OR MORE OF PRECIPITATION.

ATTENTION TO SEDIMENT ACCUMULATIONS ALONG THE SILT FENCE IS EXTREMELY IMPORTANT. ACCUMULATED SEDIMENT SHOULD BE CONTINUALLY MONITORED AND REMOVED WHEN NECESSARY.

REMOVE ACCUMULATED SEDIMENT WHEN IT REACHES 1/3 THE HEIGHT OF THE SILT FENCE.

REMOVED SEDIMENT SHALL BE PLACED IN STOCKPILE STORAGE AREAS OR SPREAD THINLY ACROSS DISTURBED AREA. STABILIZE THE REMOVED SEDIMENT AFTER IT IS RELOCATED.

CHECK FOR AREAS WHERE STORMWATER RUNOFF HAS ERODED A CHANNEL BENEATH THE SILT FENCE, OR WHERE THE FENCE HAS SAGGED OR COLLAPSED DUE TO RUNOFF OVERTOPPING THE SILT FENCE. INSTALL CHECKS/TIE-BACKS AND/OR REINSTALL SILT FENCE, AS NECESSARY.

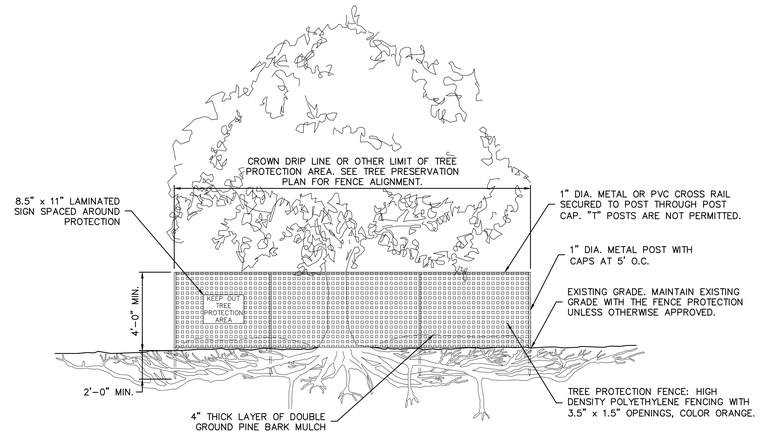
CHECK FOR TEARS WITHIN THE SILT FENCE, AREAS WHERE SILT FENCE HAS BEGUN TO DECOMPOSE, AND FOR ANY OTHER CIRCUMSTANCE THAT MAY RENDER THE SILT FENCE INEFFECTIVE. REMOVED DAMAGED SILT FENCE AND REINSTALL NEW SILT FENCE IMMEDIATELY.

SILT FENCE SHOULD BE REMOVED WITHIN 30 DAYS AFTER FINAL STABILIZATION IS ACHIEVED AND ONCE IT IS REMOVED, THE RESULTING DISTURBED AREA SHALL BE PERMANENTLY STABILIZED.

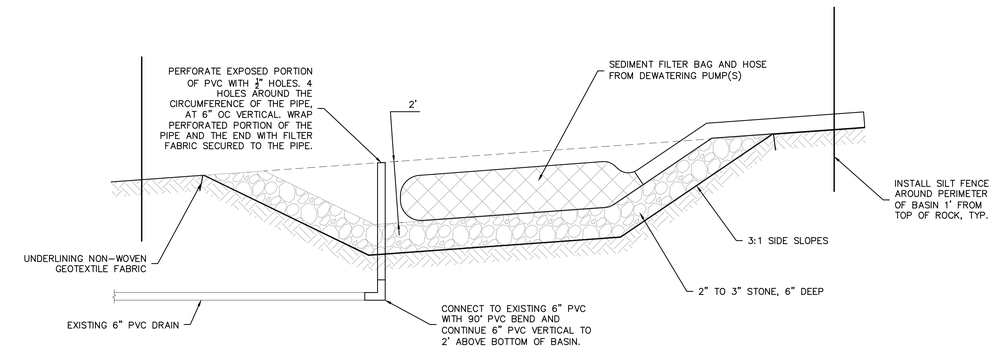
SF SF B SCDES SILT FENCE DETAIL
NOT TO SCALE

NOTES:

1. SEE SPECIFICATIONS FOR ADDITIONAL TREE PROTECTION REQUIREMENTS.
2. NO PRUNING SHALL BE PERFORMED WITHOUT SPECIFIC CONSULTATION AND APPROVAL BY THE CITY OF CHARLESTON DEPARTMENT OF PARKS. ALL PRUNING MUST BE PERFORMED BY A CERTIFIED ARBORIST.
3. NO EQUIPMENT SHALL OPERATE INSIDE THE PROTECTIVE FENCING FOR ANY REASON INCLUDING FENCE INSTALL.
4. TREE BARRICADES SHALL BE ERECTED AT A MINIMUM DISTANCE FROM THE BASE OF THE PROTECTED TREES AND/OR GRAND TREES ACCORDING TO THE FOLLOWING STANDARDS:
   - FOR PROTECTED TREES 23" DIAMETER BREAST HEIGHT (DBH) OR LESS, PROTECTIVE BARRICADES SHALL BE PLACED A MINIMUM DISTANCE OF TEN (10) FEET FROM THE BASE OF EACH PROTECTED TREE.
   - FOR PROTECTED TREES GREATER THAN 23" DBH AND GRAND TREES, PROTECTIVE BARRICADES SHALL PROVIDE A DIAMETER OF PROTECTION AROUND THE TREE EQUAL IN FEET TO THE DBH OF THE TREE (24" DBH TREE = 24' DIA. BARRICADE).
5. BARRICADES MAY BE ADJUSTED TO ADDRESS EXISTING TREE WELLS, SIDEWALKS, OR OTHER ITEMS. ADJUSTMENTS MUST BE MADE UPON STRICT REVIEW AND APPROVAL FORM THE DEPARTMENT OF PARKS.



TB D TREE BARRICADE DETAIL
NOT TO SCALE



E DEWATERING BASIN
NOT TO SCALE

ADC ENGINEERING
1226 YEAMANS HALL ROAD
HANAHAN, SC 29410
843-566-0161
ADCENGINEERING.COM
ADC PROJECT #25039

SC811

SOUTH CAROLINA No. 24567 3/16/26 CHRISTOPHER B. CODY

SOUTH CAROLINA ADC ENGINEERING INC. No. 00253

△ Revision Date Description

EARLY SITE PACKAGE
106 COMING STREET

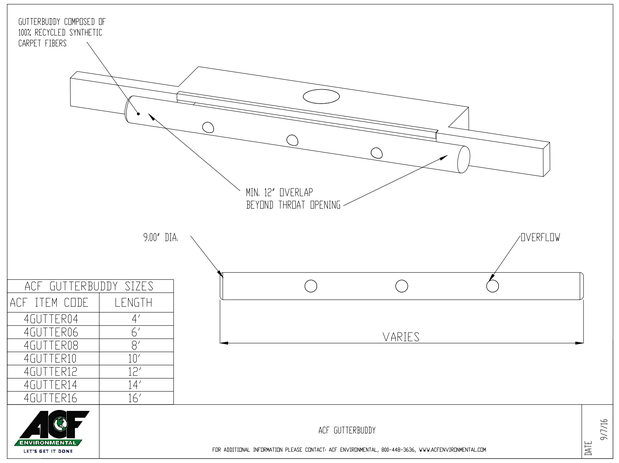
COLLEGE of CHARLESTON 1770

PROJECT 205
NEW CONSTRUCTION

State Project Number:	H15-9689-PD
Project Number:	25700
Checked By:	CBC / GFJ
Drawn By:	ARW
Date:	03/16/26
Scale:	

C610
CIVIL DETAILS - SWPPP & EROSION CONTROL

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ACF GUTTERBUDDY SIZES	
ACF ITEM CODE	LENGTH
4GUTTER04	4'
4GUTTER06	6'
4GUTTER08	8'
4GUTTER10	10'
4GUTTER12	12'
4GUTTER14	14'
4GUTTER16	16'

ACF ENVIRONMENTAL — LET'S GET IT DONE

ACF GUTTERBUDDY

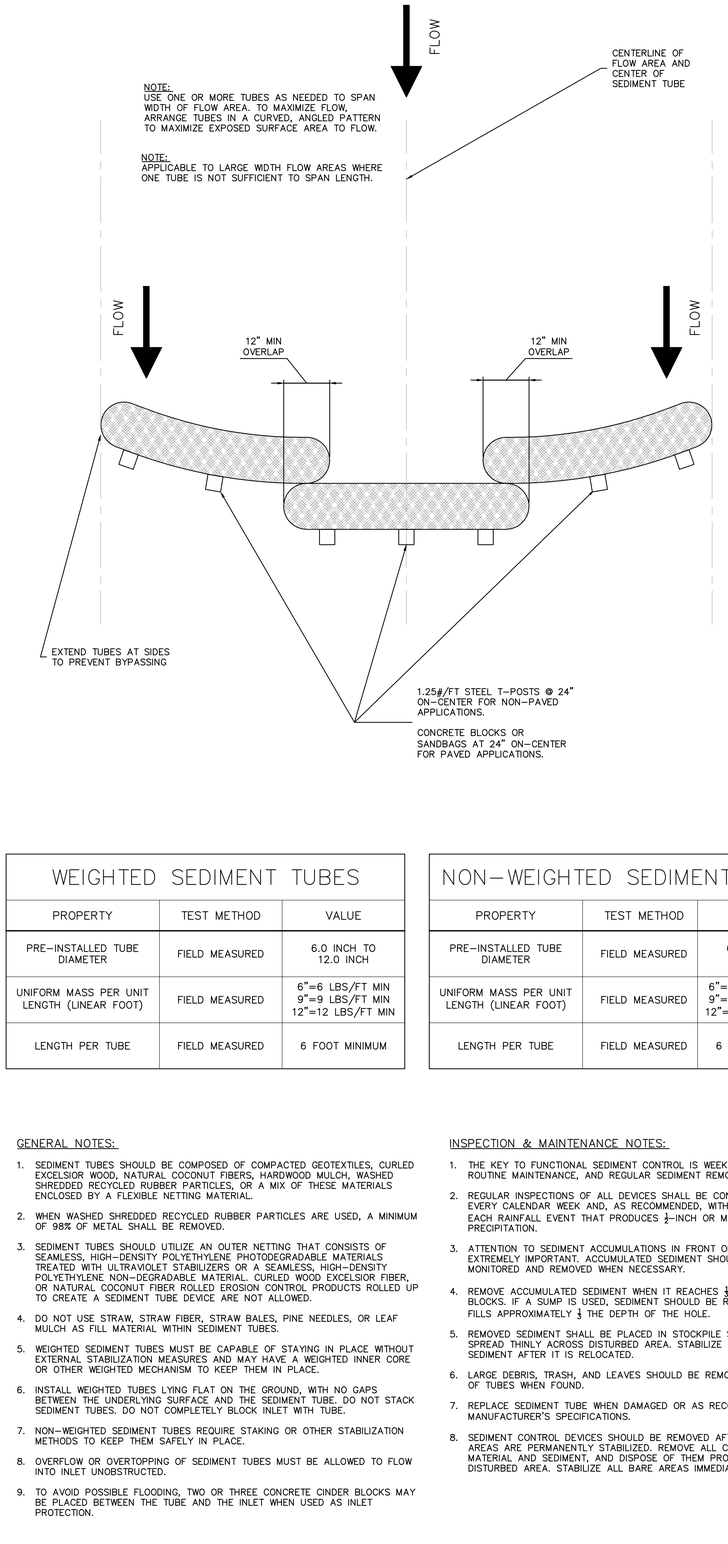
FOR ADDITIONAL INFORMATION PLEASE CONTACT: ACF ENVIRONMENTAL, 800-448-3636, WWW.ACFENVIRONMENTAL.COM

DATE 9/7/16

GENERAL NOTES:

1. CONTRACTOR SHALL UTILIZE ACF ENVIRONMENTAL GUTTERBUDDY INLET PROTECTION, OR APPROVED EQUAL, FOR CURB INLETS. APPROVED EQUAL SHALL BE SUBMITTED TO THE ENGINEER FOR APPROVAL.
2. ONLY USE SURFACE CURB INLET FILTERS THAT ARE A MINIMUM LENGTH THAT IS 2-FEET LONGER THAN THE LENGTH OF THE CURB OPENING.
3. SURFACE COURSE INLETS FILTERS THAT ARE DESIGNED TO COMPLETELY BLOCK THE INLET OPENING ARE PROHIBITED. ACCEPTABLE INLET FILTERS SHOULD ALLOW FOR OVERFLOWS TO ENTER THE CATCH BASIN.
4. EACH FILTER SHOULD HAVE AGGREGATE COMPARTMENTS FOR STONE, SAND, AND OTHER WEIGHTED MATERIALS OR MECHANISMS TO HOLD THE UNIT IN PLACE. FILL AGGREGATE COMPARTMENTS TO A LEVEL (AT LEAST 1/2 FULL) TO HOLD THE FILTER IN PLACE AND CREATE A SEAL BETWEEN THE FILTER AND THE ROAD SURFACE.

A CURB INLET PROTECTION
NOT TO SCALE



WEIGHTED SEDIMENT TUBES		
PROPERTY	TEST METHOD	VALUE
PRE-INSTALLED TUBE DIAMETER	FIELD MEASURED	6.0 INCH TO 12.0 INCH
UNIFORM MASS PER UNIT LENGTH (LINEAR FOOT)	FIELD MEASURED	6"=6 LBS/FT MIN 9"=9 LBS/FT MIN 12"=12 LBS/FT MIN
LENGTH PER TUBE	FIELD MEASURED	6 FOOT MINIMUM

NON-WEIGHTED SEDIMENT TUBES		
PROPERTY	TEST METHOD	VALUE
PRE-INSTALLED TUBE DIAMETER	FIELD MEASURED	6.0 INCH TO 12.0 INCH
UNIFORM MASS PER UNIT LENGTH (LINEAR FOOT)	FIELD MEASURED	6"=1.0 LBS/FT MIN 9"=1.5 LBS/FT MIN 12"=2.0 LBS/FT MIN
LENGTH PER TUBE	FIELD MEASURED	6 FOOT MINIMUM

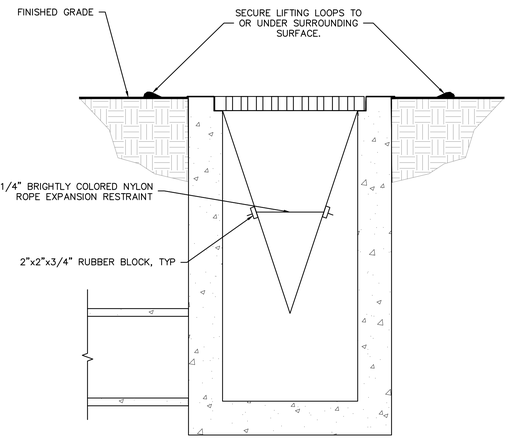
GENERAL NOTES:

1. SEDIMENT TUBES SHOULD BE COMPOSED OF COMPACTED GEOTEXTILES, CURLED EXCELSIOR WOOD, NATURAL COCONUT FIBERS, HARDWOOD MULCH, WASHED SHREDDED RECYCLED RUBBER PARTICLES, OR A MIX OF THESE MATERIALS ENCLOSED BY A FLEXIBLE NETTING MATERIAL.
2. WHEN WASHED SHREDDED RECYCLED RUBBER PARTICLES ARE USED, A MINIMUM OF 98% OF METAL SHALL BE REMOVED.
3. SEDIMENT TUBES SHOULD UTILIZE AN OUTER NETTING THAT CONSISTS OF SEAMLESS, HIGH-DENSITY POLYETHYLENE PHOTODEGRADABLE MATERIALS TREATED WITH ULTRAVIOLET STABILIZERS OR A SEAMLESS, HIGH-DENSITY POLYETHYLENE NON-DEGRADABLE MATERIAL. CURLED WOOD EXCELSIOR FIBER, OR NATURAL COCONUT FIBER ROLLED EROSION CONTROL PRODUCTS ROLLED UP TO CREATE A SEDIMENT TUBE DEVICE ARE NOT ALLOWED.
4. DO NOT USE STRAW, STRAW FIBER, STRAW BALES, PINE NEEDLES, OR LEAF MULCH AS FILL MATERIAL WITHIN SEDIMENT TUBES.
5. WEIGHTED SEDIMENT TUBES MUST BE CAPABLE OF STAYING IN PLACE WITHOUT EXTERNAL STABILIZATION MEASURES AND MAY HAVE A WEIGHTED INNER CORE OR OTHER WEIGHTED MECHANISM TO KEEP THEM IN PLACE.
6. INSTALL WEIGHTED TUBES LYING FLAT ON THE GROUND, WITH NO GAPS BETWEEN THE UNDERLYING SURFACE AND THE SEDIMENT TUBE. DO NOT STACK SEDIMENT TUBES. DO NOT COMPLETELY BLOCK INLET WITH TUBE.
7. NON-WEIGHTED SEDIMENT TUBES REQUIRE STAKING OR OTHER STABILIZATION METHODS TO KEEP THEM SAFELY IN PLACE.
8. OVERFLOW OR OVERTOPPING OF SEDIMENT TUBES MUST BE ALLOWED TO FLOW INTO INLET UNOBSTRUCTED.
9. TO AVOID POSSIBLE FLOODING, TWO OR THREE CONCRETE CINDER BLOCKS MAY BE PLACED BETWEEN THE TUBE AND THE INLET WHEN USED AS INLET PROTECTION.

INSPECTION & MAINTENANCE NOTES:

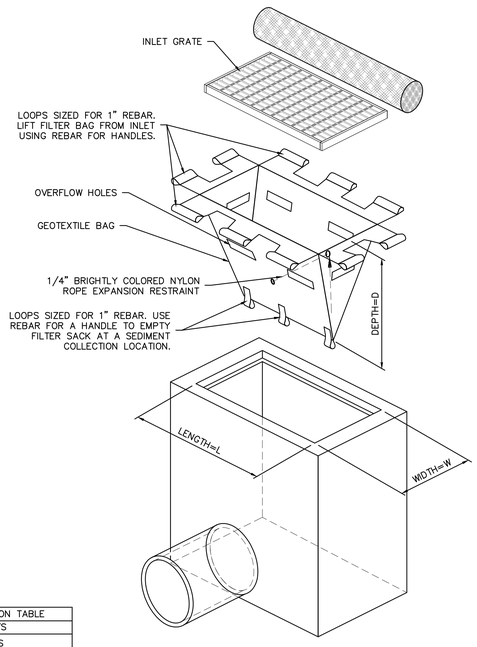
1. THE KEY TO FUNCTIONAL SEDIMENT CONTROL IS WEEKLY INSPECTION, ROUTINE MAINTENANCE, AND REGULAR SEDIMENT REMOVAL.
2. REGULAR INSPECTIONS OF ALL DEVICES SHALL BE CONDUCTED ONCE EVERY CALENDAR WEEK AND, AS RECOMMENDED, WITHIN 24-HOURS AFTER EACH RAINFALL EVENT THAT PRODUCES ½-INCH OR MORE OF PRECIPITATION.
3. ATTENTION TO SEDIMENT ACCUMULATIONS IN FRONT OF THE DEVICE IS EXTREMELY IMPORTANT. ACCUMULATED SEDIMENT SHOULD BE CONTINUALLY MONITORED AND REMOVED WHEN NECESSARY.
4. REMOVE ACCUMULATED SEDIMENT WHEN IT REACHES ½ THE HEIGHT OF THE BLOCKS. IF A SUMP IS USED, SEDIMENT SHOULD BE REMOVED WHEN IT FILLS APPROXIMATELY ⅓ THE DEPTH OF THE HOLE.
5. REMOVED SEDIMENT SHALL BE PLACED IN STOCKPILE STORAGE AREAS OR SPREAD THINLY ACROSS DISTURBED AREA. STABILIZE THE REMOVED SEDIMENT AFTER IT IS RELOCATED.
6. LARGE DEBRIS, TRASH, AND LEAVES SHOULD BE REMOVED FROM IN FRONT OF TUBES WHEN FOUND.
7. REPLACE SEDIMENT TUBE WHEN DAMAGED OR AS RECOMMENDED BY MANUFACTURER'S SPECIFICATIONS.
8. SEDIMENT CONTROL DEVICES SHOULD BE REMOVED AFTER THE DISTURBED AREAS ARE PERMANENTLY STABILIZED. REMOVE ALL CONSTRUCTION MATERIAL AND SEDIMENT, AND DISPOSE OF THEM PROPERLY. GRADE THE DISTURBED AREA. STABILIZE ALL BARE AREAS IMMEDIATELY.

C WEIGHTED SEDIMENT TUBE DETAIL
NOT TO SCALE



SECTION VIEW

PROFILE VIEW OF INSTALLED FILTER SACK



ISOMETRIC VIEW

NOTES:

1. REMOVE TRAPPED SEDIMENT WHEN BRIGHTLY COLORED EXPANSION RESTRAINT CAN NO LONGER BE SEEN.
2. GEOTEXTILE SHALL BE A WOVEN POLYPROPYLENE FABRIC THAT MEETS OR EXCEEDS REQUIREMENTS IN THE SPECIFICATIONS TABLE.
3. PLACE AN OIL ADSORBENT PAD OR PILLOW OVER INLET GRATE WHEN OIL SPILLS ARE A CONCERN.
4. INSPECT PER REGULATORY REQUIREMENTS.
5. THE WIDTH, "W", OF THE FILTER SACK SHALL MATCH THE INSIDE WIDTH OF THE GRATED INLET BOX.
6. THE DEPTH, "D", OF THE FILTER SACK SHALL BE BETWEEN 18 INCHES AND 36 INCHES.
7. THE LENGTH, "L", OF THE FILTER SACK SHALL MATCH THE INSIDE LENGTH OF THE GRATED INLET BOX.

LOW TO MODERATE FLOW GEOTEXTILE FABRIC SPECIFICATION TABLE		
PROPERTIES	TEST METHOD	UNITS
GRAB TENSILE STRENGTH	ASTM D-4632	300 LBS
GRAB TENSILE ELONGATION	ASTM D-4632	20 %
PUNCTURE	ASTM D-4833	120 LBS
MULLEN BURST	ASTM D-3786	800 PSI
TRAPEZOID TEAR	ASTM D-4533	120 LBS
UV RESISTANCE	ASTM D-4355	80 %
APPARENT OPENING SIZE	ASTM D-4751	40 US SIEVE
FLOW RATE	ASTM D-4491	40 GAL/MIN/SQ FT
PERMITTIVITY	ASTM D-4491	0.55 SEC $^{-1}$
MODERATE TO HIGH FLOW GEOTEXTILE FABRIC SPECIFICATION TABLE		
PROPERTIES	TEST METHOD	UNITS
GRAB TENSILE STRENGTH	ASTM D-4632	265 LBS
GRAB TENSILE ELONGATION	ASTM D-4632	20 %
PUNCTURE	ASTM D-4833	135 LBS
MULLEN BURST	ASTM D-3786	420 PSI
TRAPEZOID TEAR	ASTM D-4533	45 LBS
UV RESISTANCE	ASTM D-4355	90 %
APPARENT OPENING SIZE	ASTM D-4751	20 US SIEVE
FLOW RATE	ASTM D-4491	200 GAL/MIN/SQ FT
PERMITTIVITY	ASTM D-4491	1.5 SEC $^{-1}$

B FILTER SACK INLET PROTECTION
NOT TO SCALE

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ADC ENGINEERING
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ADC PROJECT #25039

SC811

SOUTH CAROLINA No. 14567 CHRISTOPHER B. COOK 3/16/26

SOUTH CAROLINA ADC ENGINEERING INC. No. 00253 CERTIFICATE OF AUTHORIZATION

△ Revision Date Description

EARLY SITE PACKAGE
106 COMING STREET

COLLEGE of CHARLESTON 1770

PROJECT 205
NEW CONSTRUCTION

State Project Number:	H15-9689-PD
Project Number:	25700
Checked By:	CBC / GFJ
Drawn By:	ARW
Date:	03/16/26
Scale:	

C611
CIVIL DETAILS - SWPPP & EROSION CONTROL

SCDES STANDARD NOTES:

1. IF NECESSARY, SLOPES, WHICH EXCEED EIGHT (8) VERTICAL FEET SHOULD BE STABILIZED WITH SYNTHETIC OR VEGETATIVE MATS, IN ADDITION TO HYDROSEEDING. IT MAY BE NECESSARY TO INSTALL TEMPORARY SLOPE DRAINS DURING CONSTRUCTION. TEMPORARY BERMS MAY BE NEEDED UNTIL THE SLOPE IS BROUGHT TO GRADE.

2. STABILIZATION MEASURES SHALL BE INITIATED AS SOON AS PRACTICABLE IN PORTIONS OF THE SITE WHERE CONSTRUCTION ACTIVITIES HAVE TEMPORARILY OR PERMANENTLY CEASED, BUT IN NO CASE MORE THAN FOURTEEN (14) DAYS AFTER WORK HAS CEASED, EXCEPT AS STATED BELOW.
   - WHERE STABILIZATION BY THE 14TH DAY IS PRECLUDED BY SNOW COVER OR FROZEN GROUND CONDITIONS STABILIZATION MEASURES MUST BE INITIATED AS SOON AS PRACTICABLE.
   - WHERE CONSTRUCTION ACTIVITY ON A PORTION OF THE SITE IS TEMPORARILY CEASED, AND EARTH-DISTURBING ACTIVITIES WILL BE RESUMED WITHIN 14 DAYS, TEMPORARY STABILIZATION MEASURES DO NOT HAVE TO BE INITIATED ON THAT PORTION OF THE SITE.

3. ALL SEDIMENT AND EROSION CONTROL DEVICES SHALL BE INSPECTED ONCE EVERY CALENDAR WEEK. IF PERIODIC INSPECTION OR OTHER INFORMATION INDICATES THAT A BMP HAS BEEN INAPPROPRIATELY OR INCORRECTLY INSTALLED, THE PERMITTEE MUST ADDRESS THE NECESSARY REPLACEMENT OR MODIFICATION REQUIRED TO CORRECT THE BMP WITHIN 48 HOURS OF IDENTIFICATION.

4. PROVIDE SILT FENCE AND/OR OTHER CONTROL DEVICES, AS MAY BE REQUIRED, TO CONTROL SOIL EROSION DURING UTILITY CONSTRUCTION. ALL DISTURBED AREAS SHALL BE CLEANED, GRADED, AND STABILIZED WITH GRASSING IMMEDIATELY AFTER THE UTILITY INSTALLATION. FILL, COVER, AND TEMPORARY SEEDING AT THE END OF EACH DAY ARE RECOMMENDED. IF WATER IS ENCOUNTERED WHILE TRENCHING, THE WATER SHOULD BE FILTERED TO REMOVE SEDIMENT BEFORE BEING PUMPED BACK INTO ANY WATERS OF THE STATE.

5. ALL EROSION CONTROL DEVICES SHALL BE PROPERLY MAINTAINED DURING ALL PHASES OF CONSTRUCTION UNTIL THE COMPLETION OF ALL CONSTRUCTION ACTIVITIES AND ALL DISTURBED AREAS HAVE BEEN STABILIZED. ADDITIONAL CONTROL DEVICES MAY BE REQUIRED DURING CONSTRUCTION IN ORDER TO CONTROL EROSION AND/OR OFFSITE SEDIMENTATION. ALL TEMPORARY CONTROL DEVICES SHALL BE REMOVED ONCE CONSTRUCTION IS COMPLETE AND THE SITE IS STABILIZED.

6. THE CONTRACTOR MUST TAKE NECESSARY ACTION TO MINIMIZE THE TRACKING OF MUD ONTO PAVED ROADWAY(S) FROM CONSTRUCTION AREAS AND THE GENERATION OF DUST. THE CONTRACTOR SHALL DAILY REMOVE MUD/SOIL FROM PAVEMENT, AS MAY BE REQUIRED.

7. RESIDENTIAL SUBDIVISIONS REQUIRE EROSION CONTROL FEATURES FOR INFRASTRUCTURE AS WELL AS FOR INDIVIDUAL LOT CONSTRUCTION. INDIVIDUAL PROPERTY OWNERS SHALL FOLLOW THESE PLANS DURING CONSTRUCTION OR OBTAIN APPROVAL OF AN INDIVIDUAL PLAN IN ACCORDANCE WITH S.C REG. 72-300 ET SEQ. AND SCR100000.

8. TEMPORARY DIVERSION BERMS AND/OR DITCHES WILL BE PROVIDED AS NEEDED DURING CONSTRUCTION TO PROTECT WORK AREAS FROM UPSLOPE RUNOFF AND/OR TO DIVERT SEDIMENT-LADEN WATER TO APPROPRIATE TRAPS OR STABLE OUTLETS.

9. ALL WATERS OF THE STATE (WOS), INCLUDING WETLANDS, ARE TO BE FLAGGED OR OTHERWISE CLEARLY MARKED IN THE FIELD. A DOUBLE ROW OF SILT FENCE IS TO BE INSTALLED IN ALL AREAS WHERE A 50-FOOT BUFFER CAN'T BE MAINTAINED BETWEEN THE DISTURBED AREA AND ALL WOS. A 10-FOOT BUFFER SHOULD BE MAINTAINED BETWEEN THE LAST ROW OF SILT FENCE AND ALL WOS.

10. LITTER, CONSTRUCTION DEBRIS, OILS, FUELS, AND BUILDING PRODUCTS WITH SIGNIFICANT POTENTIAL FOR IMPACT (SUCH AS STOCKPILES OF FRESHLY TREATED LUMBER) AND CONSTRUCTION CHEMICALS THAT COULD BE EXPOSED TO STORM WATER MUST BE PREVENTED FROM BECOMING A POLLUTANT SOURCE IN STORM WATER DISCHARGES.

11. A COPY OF THE SWPPP, INSPECTIONS RECORDS, AND RAINFALL DATA MUST BE RETAINED AT THE CONSTRUCTION SITE OR A NEARBY LOCATION EASILY ACCESSIBLE DURING NORMAL BUSINESS HOURS, FROM THE DATE OF COMMENCEMENT OF CONSTRUCTION ACTIVITIES TO THE DATE THAT FINAL STABILIZATION IS REACHED.

12. INITIATE STABILIZATION MEASURES ON ANY EXPOSED STEEP SLOPE (3H:1V OR GREATER) WHERE LAND-DISTURBING ACTIVITIES HAVE PERMANENTLY OR TEMPORARILY CEASED, AND WILL NOT RESUME FOR A PERIOD OF 7 CALENDAR DAYS.

13. MINIMIZE SOIL COMPACTION AND, UNLESS INFEASIBLE, PRESERVE TOPSOIL.

14. MINIMIZE THE DISCHARGE OF POLLUTANTS FROM EQUIPMENT AND VEHICLE WASHING, WHEEL WASH WATER, AND OTHER WASH WATERS. WASH WATERS MUST BE TREATED IN A SEDIMENT BASIN OR ALTERNATIVE CONTROL THAT PROVIDES EQUIVALENT OR BETTER TREATMENT PRIOR TO DISCHARGE.

15. MINIMIZE THE DISCHARGE OF POLLUTANTS FROM DEWATERING OF TRENCHES AND EXCAVATED AREAS. THESE DISCHARGES ARE TO BE ROUTED THROUGH APPROPRIATE BMPS (SEDIMENT BASIN, FILTER BAG, ETC.).

16. THE FOLLOWING DISCHARGES FROM SITES ARE PROHIBITED:
   - WASTEWATER FROM WASHOUT OF CONCRETE, UNLESS MANAGED BY AN APPROPRIATE CONTROL;
   - WASTEWATER FROM WASHOUT AND CLEANOUT OF STUCCO, PAINT, FORM RELEASE OILS, CURING COMPOUNDS AND OTHER CONSTRUCTION MATERIALS;
   - FUELS, OILS, OR OTHER POLLUTANTS USED IN VEHICLE AND EQUIPMENT OPERATION AND MAINTENANCE; AND
   - SOAPS OR SOLVENTS USED IN VEHICLE AND EQUIPMENT WASHING.

17. AFTER CONSTRUCTION ACTIVITIES BEGIN, INSPECTIONS MUST BE CONDUCTED AT A MINIMUM OF AT LEAST ONCE EVERY CALENDAR WEEK AND MUST BE CONDUCTED UNTIL FINAL STABILIZATION IS REACHED ON ALL AREAS OF THE CONSTRUCTION SITE.

18. IF EXISTING BMPS NEED TO BE MODIFIED OR IF ADDITIONAL BMPS ARE NECESSARY TO COMPLY WITH THE REQUIREMENTS OF THIS PERMIT AND/OR SC'S WATER QUALITY STANDARDS, IMPLEMENTATION MUST BE COMPLETED BEFORE THE NEXT STORM EVENT WHENEVER PRACTICABLE. IF IMPLEMENTATION BEFORE THE NEXT STORM EVENT IS IMPRACTICABLE, THE SITUATION MUST BE DOCUMENTED IN THE SWPPP AND ALTERNATIVE BMPS MUST BE IMPLEMENTED AS SOON AS REASONABLY POSSIBLE.

19. A PRE-CONSTRUCTION CONFERENCE MUST BE HELD FOR EACH CONSTRUCTION SITE WITH AN APPROVED ON-SITE SWPPP PRIOR TO THE IMPLEMENTATION OF CONSTRUCTION ACTIVITIES. FOR NON-LINEAR PROJECTS THAT DISTURB 10 ACRES OR MORE THIS CONFERENCE MUST BE HELD ON-SITE UNLESS THE DEPARTMENT HAS APPROVED OTHERWISE.

DEWATERING NOTES:

1. THE DESIGN, ADEQUACY AND OPERATION OF ANY AND ALL DEWATERING ACTIVITIES IS THE SOLE RESPONSIBILITY OF THE CONTRACTOR.

2. THE CONTRACTOR SHALL PROTECT ALL ADJACENT PROPERTIES, RIGHTS OF WAYS, NATURAL AREAS AND EXISTING UTILITY SYSTEMS FROM EROSION AND SEDIMENTATION ASSOCIATED WITH DEWATERING ACTIVITIES.

3. DEWATERING OF EXISTING PONDS OR LARGE PONDING AREAS SHALL ALWAYS UTILIZE A FLOATING INTAKE.

4. DEWATERING DISCHARGES SHALL ALWAYS BE DIRECTED THROUGH SUITABLE BEST MANAGEMENT PRACTICE (BMP) SUCH AS A TEMPORARY SEDIMENT POND/TRAP OR SEDIMENT TRAPPING DEWATERING BAG.

5. ALL DEWATERING ACTIVITIES SHOULD BE IN ACCORDANCE WITH THE SCDES CGP.

SCDES POST-CONSTRUCTION MAINTENANCE REQUIREMENTS

SYSTEM	MAINTENANCE REQUIREMENTS	MAINTENANCE FREQUENCY
A. VEGETATED AREAS	1. MOW GRASS 2. REMOVE ALL LITTER AND DEBRIS 3. REMOVE AND REPLACE DEAD OR DISEASED VEGETATION 4. REPLACE / REPLENISH MULCH 5. REMOVE WEEDS 6. PRUNE VEGETATION TO MAINTAIN APPEARANCE	1. MONTHLY 2. MONTHLY 3. SEMI-ANNUALLY 4. SEMI-ANNUALLY 5. SEMI-ANNUALLY 6. SEMI-ANNUALLY

SCDES STORMWATER AS-BUILT/RECORD DRAWING REQUIREMENTS:

1. PRIOR TO SUBSTANTIAL COMPLETION AND PRIOR TO REQUESTING FINAL SITE INSPECTION BY SCDES THE CONTRACTOR SHALL PROVIDE AND RECEIVE APPROVAL OF AS-BUILT/RECORD DRAWINGS CONSISTING OF SURVEY DRAWINGS MEETING THE FOLLOWING REQUIREMENTS:

   A. FIELD SURVEYED DRAWINGS BASED ON AN AS-BUILT SURVEY OF NEWLY CONSTRUCTED STORM WATER MANAGEMENT FACILITIES WITH:

      (i) EXISTING GRADES/CONTOURS/DEPTHS OF THE FACILITY.
      (ii) ELEVATIONS AND DIMENSIONS OF ALL INLET/OUTLET STRUCTURES, INCLUDING:
      - PIPE AND ORIFICE INVERTS AND DIAMETERS.
      - WEIR ELEVATIONS AND DIMENSIONS.
      - RISER DIMENSIONS AND ELEVATIONS.
      - EMERGENCY SPILLWAY DIMENSIONS AND ELEVATIONS.
      - LOCATIONS AND INVERTS FOR ALL PIPES DISCHARGING INTO THE FACILITY.
      - LOCATIONS AND INVERTS FOR ALL PIPES EXITING THE FACILITY.
      - DETAILED SKETCHES OF THE STRUCTURES SHALL BE PROVIDED IF NECESSARY FOR CLARITY.

      (iii) SPOT ELEVATIONS ALONG THE TOP, BOTTOM AND SHELVES OF THE FACILITY'S EMBANKMENT.
      (iv) CONTOURS, DIMENSION, AND LOCATIONS OF ALL STRUCTURAL COMPONENTS (E.G., FOREBAYS, LEVEL SPREADERS, RIP RAP APRONS, INLET STRUCTURES, LOW FLOW CHANNELS) OF THE FACILITY.
      (v) TABLE OF ELEVATIONS AND ASSOCIATED CONTOUR AREA AT EACH ELEVATION FOR STAGE/STORAGE VERIFICATION. IF FACILITY IS SEPARATED INTO DIFFERENT BASINS OR FOREBAYS, THE TABLE SHALL PROVIDE AREA DATA FOR EACH SEPARATE BASIN.
      (vi) WETLAND AREAS

   B. AS-BUILT SURVEYS SHALL BE PREPARED IN STATE PLANE COORDINATES NAD 83 DATUM.

   C. AS-BUILT SURVEYS SHALL BE PREPARED USING THE SAME VERTICAL DATUM AS USED ON THE APPROVED DESIGN PLANS.

   D. ALL DRAWINGS SHALL BEAR THE FOLLOWING STATEMENTS SIGNED BY THE SURVEYOR:

      1 HEREBY SIGN, DATE AND AFFIX MY SEAL TO CERTIFY THAT THE AS-BUILT/RECORD DRAWING SURVEY SHOWN IS CORRECT AND ACCURATE."

      _____
      S.C. REGISTERED PROFESSIONAL LAND SURVEYOR

2. THE CONTRACTOR SHALL SUBMIT PRELIMINARY VERSIONS OF THE AS-BUILT/RECORD DRAWINGS TO THE ENGINEER FOR REVIEW PRIOR TO SUBMITTING TO SCDES FOR REVIEW.

3. UPON RECEIPT OF ANY COMMENTS FROM THE ENGINEER, THE CONTRACTOR SHALL MAKE ALL NECESSARY CORRECTIONS AND RESUBMIT FINAL VERSIONS OF THE AS-BUILT/RECORD DRAWINGS TO THE ENGINEER FOR FORWARDING TO SCDES FOR REVIEW AND/OR APPROVAL.

4. UPON RECEIPT OF ANY COMMENTS FROM SCDES, THE CONTRACTOR SHALL MAKE ALL NECESSARY CORRECTIONS AND RESUBMIT CORRECTED FINAL VERSIONS OF THE AS-BUILT/RECORD DRAWINGS TO THE ENGINEER FOR FORWARDING TO SCDES FOR REVIEW AND/OR APPROVAL.

CITY OF CHARLESTON CLOSE OUT NOTES:

1. A DYE TEST MUST BE PERFORMED BY A LICENSED PLUMBER FOR SANITARY SEWER CONNECTIONS TO VALIDATE THE CONNECTIONS ARE PROPERLY ROUTED INTO THE SANITARY SEWER SYSTEM AND NOT THE STORM SEWER SYSTEM. TEST RESULTS MUST BE COMPLETED AND SUBMITTED TO THE ENGINEER A MINIMUM OF 30 DAYS PRIOR TO SUBSTANTIAL COMPLETION.

2. PRIOR TO SUBSTANTIAL COMPLETION AND PRIOR TO REQUESTING FINAL SITE INSPECTION BY THE CITY OF CHARLESTON, THE CONTRACTOR SHALL PROVIDE AND RECEIVE APPROVAL OF AS-BUILT/RECORD DRAWINGS CONSISTING OF SURVEY DRAWINGS MEETING THE CITY'S REQUIREMENTS.

CITY OF CHARLESTON STORMWATER AS-BUILT/RECORD DRAWING REQUIREMENTS:

AS PART OF THE PROJECT CLOSEOUT PROCESS, A FULL-SIZE HARD COPY AND ONE ELECTRONIC PDF FORMAT COPY OF THE RECORD DRAWINGS, PROPERLY IDENTIFIED, EXECUTED, AND CERTIFIED SHALL BE DELIVERED TO THE ENGINEERING DIVISION. ADDITIONALLY, THE RECORD DRAWINGS FOR STORMWATER FACILITIES SHALL CONTAIN THE FOLLOWING INFORMATION:

6.3.1 PIPED DRAINAGE SYSTEMS

FOR PIPED DRAINAGE SYSTEMS, THE FOLLOWING INFORMATION SHALL BE PROVIDED ON THE DRAWINGS:

1. ACTUAL VALUES BESIDE PLANNED VALUES ON THE APPROVED CONSTRUCTION PLANS.
2. ELEVATIONS TO THE NEAREST 0.01 FOOT. ACTUAL ELEVATIONS WITHIN 0.10 FOOT OF THE PLANNED VALUES ARE SUFFICIENT EXCEPT WHERE HIGHER ACCURACY IS NEEDED TO INDICATE POSITIVE FLOW.
3. DIAMETER, MATERIAL, AND CLASS OF ALL PIPES.
4. TYPE OF JOINT OF ALL PIPES. (O-RING, T&G, ETC.)
5. INVERT OF PIPE AT OUTFALL AND ALL STRUCTURES.
6. SLOPE AND LENGTHS OF ALL PIPE.
7. STRUCTURE TYPE AND ELEVATIONS. (TOP OF GRATE, THROAT ELEVATION, ETC.)
8. LOCATION OF PIPE AND STRUCTURES IN RELATION TO DRAINAGE EASEMENTS ON PLAN VIEW.
9. CENTERLINE ROADWAY ELEVATIONS AT ALL LOW POINTS AND OTHER STORMWATER CROSSINGS.
10. LENGTH, DEPTH, AND WIDTH OF OUTFALL PROTECTION AS SPECIFIED.

6.3.2 OPEN CHANNEL DRAINAGE SYSTEMS

FOR OPEN CHANNEL DRAINAGE SYSTEMS, THE FOLLOWING INFORMATION SHALL BE PROVIDED ON THE DRAWINGS:

1. ACTUAL VALUES BESIDE PLANNED VALUES ON THE APPROVED CONSTRUCTION PLANS.
2. ELEVATIONS TO THE NEAREST 0.1 FOOT EXCEPT WHERE HIGHER ACCURACY IS NEEDED TO INDICATE POSITIVE FLOW.
3. ACTUAL ELEVATIONS WITHIN 0.1 FOOT OF THE PLANNED VALUES ARE SUFFICIENT EXCEPT WHERE HIGHER ACCURACY IS NEEDED TO INDICATE POSITIVE FLOW.
4. SLOPE OF ALL OPEN CHANNELS.
5. FOR SWALES 1 FOOT OR LESS IN DEPTH, ACTUAL SIDE SLOPES AND SPOT INVERT ELEVATIONS AT A FREQUENCY OF AT LEAST EVERY 100 FEET.
6. FOR SWALES OR DITCHES GREATER THAN 1 FOOT IN DEPTH, TOP OF BANK AND TOE OF SLOPE DESIGNATIONS AND ELEVATIONS AT A FREQUENCY OF AT LEAST EVERY 100 FEET.
7. FOR DITCHES 3 FEET OR GREATER IN DEPTH, ACTUAL 1 FOOT CONTOURS.
8. LOCATION OF DITCH OR SWALE IN RELATION TO DRAINAGE EASEMENTS ON PLAN VIEW.
9. LENGTH, DEPTH, AND WIDTH OF OUTFALL PROTECTION OR OTHER EROSION CONTROL AS SPECIFIED.

6.3.3 STORMWATER MANAGEMENT POND OR BASIN

FOR STORMWATER MANAGEMENT PONDS OR BASINS, THE FOLLOWING INFORMATION SHALL BE PROVIDED ON THE DRAWINGS:

1. ACTUAL VALUES BESIDE PLANNED VALUES ON THE APPROVED CONSTRUCTION PLANS.
2. ELEVATIONS TO THE NEAREST 0.01 FOOT. ACTUAL ELEVATIONS WITHIN 0.10 FOOT OF THE PLANNED VALUES ARE SUFFICIENT EXCEPT WHERE HIGHER ACCURACY IS NEEDED TO INDICATE POSITIVE FLOW.
3. SUFFICIENT ELEVATIONS ALONG TOP OF DAM/POND TO VERIFY DESIGN ELEVATION.
4. SUFFICIENT ELEVATIONS ALONG TOE OF SLOPE AND BOTTOM OF POND TO VERIFY DESIGN ELEVATION.
5. ACTUAL 1 FOOT CONTOURS AND A STAGE-VOLUME TABLE TO CONFIRM DESIGN VOLUME.
6. POND SLOPES AND VEGETATIVE COVER. (INCLUDE INFILTRATION RATE OF SOD PLACED IN PROPOSED INFILTRATION BASINS, IF APPLICABLE)
7. LOCATION, ELEVATIONS, SLOPES, AND DIMENSIONS OF ORIFICES, WEIRS, SPILLWAYS, TRASH RACKS, OR ANY OTHER ASPECTS OF OUTFALL CONTROL.
8. LOCATION, DIMENSIONS, AND ELEVATIONS OF EMERGENCY SPILLWAY.
9. OUTFALL PROTECTION LOCATION AND DIMENSIONS.
10. WATER ELEVATION IN POND AT TIME OF SURVEY, IF APPLICABLE.
11. LOCATION, DIMENSIONS, MAKE OR BRAND, MODEL, SERIAL NUMBER AND MAINTENANCE MANUAL FOR ANY ENGINEERED WATER QUALITY TREATMENT DEVICES.

6.3.4 PROJECT DATUM

AS-BUILTS SHALL CLEARLY STATE THE PROJECT DATUM (NAVD88) ON ALL PAGES WHERE ELEVATIONS ARE NOTED.

6.3.5 CERTIFICATIONS STATEMENT

THE RECORD DRAWING MUST INCLUDE THE FOLLOWING STATEMENT:

1 HEREBY SIGN AND AFFIX MY SEAL TO CERIFY TO THE BEST OF MY KNOWLEDGE THAT THIS RECORD DRAWING ACCURATELY REPRESENTS EXISTING FIELD CONDITIONS AND THAT THE COMPREHENSIVE STORMWATER MANAGEMENT SYSTEM, AS CONSTRUCTED, IS IN SUBSTANTIAL CONFORMANCE WITH THE STANDARDS, DIMENSIONS AND SPECIFICATIONS OF THE APPROVED CONSTRUCTION PLANS.

_____
S.C. REGISTERED PROFESSIONAL ENGINEER

ADC ENGINEERING
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ADC PROJECT #25039

SC811

SOUTH CAROLINA LICENSED PROFESSIONAL ENGINEER No. 14567 CHRISTOPHER B. COOK 3/16/26

ADC ENGINEERING INC. No. 00253 CERTIFICATE OF AUTHORIZATION

△	Revision Date	Description

EARLY SITE PACKAGE

106 COMING STREET

COLLEGE of CHARLESTON 1770

PROJECT 205 NEW CONSTRUCTION

State Project Number:	H15-9689-PD
Project Number:	25700
Checked By:	CBC / GFJ
Drawn By:	ARW
Date:	03/16/26
Scale:	

C612

CIVIL DETAILS - SWPPP & EROSION CONTROL NOTES

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APPENDIX J: TERRACON GEOTECHNICAL REPORT EXCERPT

St. Phillips Housing Innovation District
St. Phillips | Charleston, SC
Terracon Project No. EN235084

Terracon
1800 Reynolds Ave
North Charleston, SC

Boring Log No. B-13

Location: See Exploration Plan

Latitude: 32.7861° Longitude: -79.9396°

Depth (Ft.)	Description	Field Test Results
0.3	**ASPHALT**, 4 inches of asphalt	10-6-5-5
4.0	**SILTY CLAYEY SAND (SC-SM)**, trace gravel from 0 to 2 feet, fine to medium grained, light yellowish brown	1-1-1-1
6.0	**CLAY WITH SAND (CL)**, brown to reddish brown	WOH
8.0	**SILTY SAND (SM)**, fine to medium grained, light gray to light brown	3-4-4-2
10.0	**SANDY LEAN CLAY (CL)**, dark gray to gray	WOH
	LEAN CLAY (CL), dark gray to gray	1-2-2
		0-3-4
		0-2-2
27.0		
	CLAYEY SAND (SC), fine to medium grained, dark gray to gray	2-3-6
32.0		
	SILTY SAND (SM), dark gray to gray	6-5-7
		4-4-3
42.0		
	SILT WITH SAND (ML), dark gray to gray	WOH
		1-2-2
		WOH
		WOH
		2-1-2
67.0		
	SILTY SAND (SM), fine to medium grained, dark gray to gray	7-9-6
		4-6-7
78.0		
80.0	**SANDY SILT (COOPER MARL FORMATION) (ML)**, olive brown to brown	3-3-4
	Boring Terminated at 80 Feet	

Depth (Ft.): 5, 10, 15, 20, 25, 30, 35, 40, 45, 50, 55, 60, 65, 70, 75, 80

Installation Details

Water Level Observations

Sample Type

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Water Level Observations
Groundwater not encountered

Notes

Advancement Method
Rotary Wash

Abandonment Method
Boring backfilled with bentonite upon completion. Surface capped with asphalt

Drill Rig
D-50

Hammer Type
Automatic

Driller
JR

Logged by
JR

Boring Started
10-21-2025

Boring Completed
10-22-2025

St. Phillips Housing Innovation District
St. Phillips | Charleston, SC
Terracon Project No. EN235084

Terracon
1800 Reynolds Ave
North Charleston, SC

Boring Log No. B-14

Location: See Exploration Plan

Latitude: 32.7861° Longitude: -79.9393°

Depth (Ft.)	Description	Installation Details	Water Level Observations	Sample Type	Field Test Results
0.4	**FILL - POORLY GRADED GRAVEL WITH SAND (GP)**, 5 inches of gravel		▽		6-5-3-2
4.0	**SILTY SAND (SM)**, with trace gravel from 0 to 2 feet, fine to coarse grained, brown				1-1-1-1
6.0	**CLAYEY SAND (SC)**, fine to medium grained, light yellowish brown				1-1-1-3
10.0	**SILTY SAND (SM)**, fine to medium grained, light brown to brown				4-4-4-5
27.0	**CLAY (CL)**, dark gray to gray				4-3-1/12
37.0	**SILTY SAND (SM)**, fine to medium grained, dark gray to gray				WOH
47.0	**SANDY LEAN CLAY (CL)**, dark gray to gray				WOH
67.0	**SILTY SAND (SM)**, with shells from 48 to 50 feet, fine to medium grained, light gray to dark gr				2-1-2
73.0	**SILT WITH SAND (ML)**, dark gray to gray				3-3-3
78.0	**SILTY SAND (SM)**, fine to medium grained, dark gray to gray				5-6-6
80.0	**SANDY SILT (COOPER MARL FORMATION) (ML)**, olive brown to brown				3-1-2
	Boring Terminated at 80 Feet				2-2-2
					7-12-18
					12-25-32
					17-28-23
					3-4-6
					6-9-7
					6-6-9
					6-6-5

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Water Level Observations
▽ While drilling

Drill Rig
D-50

Hammer Type
Automatic

Driller
JR

Logged by
JR

Boring Started
10-21-2025

Boring Completed
10-21-2025

Notes

Advancement Method
Rotary Wash

Abandonment Method
Boring backfilled with bentonite upon completion.

St. Phillips Housing Innovation District
St. Phillips | Charleston, SC
Terracon Project No. EN235084

Terracon
1800 Reynolds Ave
North Charleston, SC

Boring Log No. B-15

Location: See Exploration Plan

Latitude: 32.7864° Longitude: -79.9393°

Depth (Ft.)	Description	Field Test Results
0.3	**ASPHALT**, 4 inches of asphalt	4-5-6-7
	SILTY SAND (SM), fine to medium grained, light yellowish brown	6-7-6-5
		3-4-6-4
8.0		3-3-4-4
10.0	**CLAY WITH SAND (CL)**, light yellowish brown	2-1-1-1
	CLAY (CL), gray to dark gray	WOH
		0-0-2
		1-2-1
		3-3-2
32.0		
	SILTY SAND (SM), fine to medium grained, gray to dark gray	3-4-4
37.0		
	SILTY CLAY (CL-ML), gray to dark gray	1-1-1
47.0		3-5-6
	SILTY SAND (SM), fine to medium grained, gray	12-17-23
57.0		18-39-53
	SANDY SILT (ML), dark gray to gray	3-2-3
62.0		
	SILTY SAND (SM), fine to medium grained, dark gray to gray	5-11-11
		3-5-7
77.0		3-4-5
	SANDY SILT (COOPER MARL FORMATION) (ML), olive brown to brown	3-3-4
80.0		
	Boring Terminated at 80 Feet	

Depth (Ft.) scale: 5, 10, 15, 20, 25, 30, 35, 40, 45, 50, 55, 60, 65, 70, 75, 80

Water Level Observations: ▽ While drilling

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes

Advancement Method
Rotary Wash

Abandonment Method
Boring backfilled with bentonite upon completion. Surface capped with asphalt

Drill Rig
D-50

Hammer Type
Automatic

Driller
JR

Logged by
JR

Boring Started
10-22-2025

Boring Completed
10-22-2025

APPENDIX K: SHPO CORRESPONDENCE

EST. 1905
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
8301 Parklane Road
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,

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

Justin Schwebler, MSHP
Senior Scientist I Environmental & Cultural Resources

1800 Reynolds Avenue I North Charleston, SC 29405
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EST. 1905
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

SHPO Correspondence #3 with Supplemental Responses

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

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.

> Flow Chart or Decision Tree may be in reference to the presented permitting process flow chart presented and provided to CEC members in the January meeting, *found in the Cemetery and Commemoration Work Plan Appendix K: CEC Monthly Exchange Packet*. This flow chart was intended to walk members through the oversite agencies, successor and predecessor reviews, current phase of permitting, and complexity behind the permitting process to get to archaeology. This reference material will be included in the Cemetery and Commemoration Work Plan as part of the Community Engagement Council (CEC) Monthly Exchange Packet, which is shared with SHPO on a monthly basis to support project transparency, information sharing, and implementation of the Information Sharing and Feedback Loop, *C&C WP Appendix M*.
> In addition, to Work Plan review comments, the College has included a Procedural Summary Matrix and Legend, *C&C WP Appendix L,* to reference defined project steps, deliverables, engagements, stakeholders, feedback sources, and governing laws and codes.

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.

The College received industry professional cost estimations based on known data to date accounting for light to heavy density of cultural resource potential. The College project funding calculations account for this scope of work and budgetary alignment with reinternment and commemoration.
If the College is not able to move forward with the end goal of constructing a residence hall, the property would be sold under its existing entitlement and zoning requirements. In that scenario, the College recognizes that future development control would transition from the institution; however, the College remains committed to carrying out its stewardship responsibilities transparently and in compliance with all applicable requirements for as long as it remains the property owner.

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.

- Cemetery and Commemoration Work Plan, APPENDIX D: Mitigation Assessment – Submitted 3.26.2026

The College has removed the term "harm avoidance" throughout the Work Plans to avoid confusion and to ensure that language accurately reflects the scope of actions proposed.
Through consultant analysis and regulatory review, it has been determined that complete preservation in place (i.e., true harm avoidance) is not feasible where development of substantial scale is proposed. Structural engineering requirements, stormwater management constraints, subsurface conditions, and required building foundations would unavoidably disturb archaeological deposits and burial features. As a result, the Work Plans are framed around mitigation and stewardship, rather than avoidance.
Accordingly, the project's proposed approach emphasizes:

- Careful archaeological investigation and documentation,
- Respectful treatment and reinterment of human remains where encountered, and
- Development of memorialization and commemoration informed by regulatory review and community engagement.

The College further notes that if it is ultimately determined that a residence hall cannot be constructed at this site, the College will not proceed with development and the property would be sold under its existing entitlement and zoning requirements.
Through these revisions and clarifications, the Work Plans now more clearly distinguish between avoidance and mitigation, align terminology with regulatory standards, and accurately convey the limits and obligations of stewardship under the proposed project framework.

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.

- Archaeological Monitoring, Archaeology Work Plan page 4
- Reporting, Archaeology Work Plan page 12
- Protocol for Unanticipated Discoveries, Archaeology Work Plan page 40-41

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).

- Stage 3 Post-Removal Geophysical Survey, Archaeology Work Plan - page 25 SUBMITTED 3.27.2026
    - Appendix - Geotech Report Excerpt

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.

- Cemetery and Commemoration Work Plan, APPENDIX C: S&ME's Historic Research and Geophysical Assessment – Submitted 3.26.2026

The S&ME assessment was prepared prior to the College's ownership of the property and as part of early due-diligence efforts. The College shared this document with SHPO on November 25, 2025 for informational and transparency purposes only, and not as a substitute for required survey documentation or as part of the formal archaeological record for Project 205.

The College concurs that the official records guiding SHPO and SCDES-BCM review must be derived from work conducted expressly under approved work plans and in coordination with the reviewing agencies. Accordingly, subsequent research and geophysical investigations conducted by BVL and Terracon, including the preparation of SHPO survey forms, Research Design, amplitude depth slices, and interpretive mapping, will serve as the report(s) of record for the project and will be relied upon to inform project methodology, staging, and decision-making. These materials are described in detail in the Archaeology Work Plan (see Geophysical Surveys (page 3-4) and Reporting (page 17-18) sections) and the Procedural Summary Matrix.

With respect to SHPO's concerns about the 2024 S&ME GPR survey, the College agrees that the limited scope, absence of amplitude depth slices, lack of independently verifiable depth interpretation, and potential surface interference (including vehicle presence) mean that those findings should not be relied upon for planning or decision-making. As reflected in the current

Work Plans, the S&ME survey does not inform or constrain any proposed GPR or EMI work to be conducted under Project 205. Instead, all geophysical investigations proposed under the Work Plans will incorporate SHPO-reviewed methodologies, provide full amplitude depth slices and supporting data, and be subject to agency review prior to advancement to subsequent stages.

The College is continuing efforts to coordinate with prior consultants to determine whether any raw data associated with the S&ME assessment can be retrieved for archival completeness; however, regardless of whether such data can be obtained, the project will proceed based solely on SHPO-reviewed and agency-approved investigations conducted specifically for Project 205.

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.

> Public comment submissions are accepted by the College of Charleston, which serves as the coordinating entity for Project 205 engagement and information management. Comments may be submitted throughout the project's lifespan through multiple established channels, including:
>
> - Email submission to coming-commons@cofc.edu, as listed on the Project 205 / Coming Street Commons website: www.coming-street-commons.charleston.edu/get-involved
> - Direct engagement with members of the Community Engagement Council (CEC) or public inquiry submissions at CEC public meetings
> - Participation in publicly noticed Community Outreach Forums
> - Referenced opportunities identified in the applicable Project Work Plans and Procedural Summary Matrix
>
> All comments received by the College are documented and integrated into the Information Sharing & Feedback Loop, which relays how feedback is reviewed, tracked, and shared with appropriate parties. Comment summaries and engagement updates are provided monthly to the CEC and included with CEC meeting minutes submitted to SHPO.
>
> If submission methods or engagement processes change as the project evolves, the College will notify the CEC through monthly updates reported to SHPO and will post updated information on the project website to ensure continued transparency and clarity for all stakeholders.
>
> While SCDES-BCM conducts regulatory review of submitted Work Plans and amendments, public comments are coordinated through the College to ensure consistent documentation, appropriate sequencing with agency review, and timely incorporation into project consultation processes.

--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."

> Reflected in the attached College of Charleston Board of Trustees Resolution (January 15–16, 2026) found in Appendix I, the Board has formally directed the Administration to advance Project 205 through a staged, responsible process, ensuring compliance with all applicable laws and regulations, integrating archaeological study, community engagement, permanent memorialization, and balancing meaningful engagement with institutional responsibilities. Importantly, the Resolution expressly acknowledges that the project is subject to regulatory review and phased decision-making, and balancing stewardship obligations throughout the process.
>
> Consistent with this direction, the Procedural Summary Matrix establishes defined decision points aligned with Stage 1 through Stage 3 archaeological work, prior to any proposed removal or reinterment of human remains. In addition, any relocation of burials would require approval by the City of Charleston Council in accordance with SC Code 27-43-10 through 27-43-40, including a four-week public notice period and a public hearing before City Council. These statutory steps necessarily provide an opportunity for further review, public input, and consideration.
>
> In addition, if the College is not able to move forward with constructing a residence hall, the property would be sold under its existing entitlement and zoning requirements. In that scenario, the College recognizes that future development control would transition from the institution; however, the College remains committed to carrying out its stewardship responsibilities transparently and in compliance with all applicable requirements for as long as it remains the property owner.
>
> Taken together, the Board-adopted governance framework, the phased Work Plan staging, the City of Charleston's statutory approval process, and the regulatory consultation requirements establish clear and enforceable checkpoints for the project.

--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?

> Reviewed and revised for consistency throughout, REVISED AND SUBMITTED 3.27.2026.

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

Reviewed and revised for consistency throughout, REVISED AND SUBMITTED 3.27.2026

Procedural Summary Matrix and Legend established in Archaeology Work Plan, APPENDIX __, to help guide.

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.

Professional Examination Plan of 106 Coming Street, page 1. SUBMITTED 3.27.2026

--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.

Professional Examination Plan of 106 Coming Street, APPENDIX A – SHPO Correspondence: Archaeology Monitoring Plan and Work Plan 1-3

--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.

Professional Examination Plan of 106 Coming Street, page 5

--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.

Professional Examination Plan of 106 Coming Street, REVISED AND SUBMITTED 3.27.2026

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.

> The College of Charleston, in coordination with Terracon Consultants, Inc., has engaged in ongoing consultation with the South Carolina Department of Environmental Services – Bureau of Coastal Management (SCDES-BCM) and the State Historic Preservation Office (SHPO) to ensure that the proposed archaeological investigations for Project 205 are fully aligned with the requirements of the Coastal Zone Consistency (CZC) Certification and associated land-disturbance permitting.
>
> Through this consultation, SCDES-BCM and SHPO provided guidance on the sequencing, scope, and decision points of archaeological work necessary to maintain regulatory compliance while allowing the permitting process to proceed in a phased and controlled manner. Key outcomes of this coordination include the formal restructuring of the archaeological methodology into

discrete, reviewable stages; the establishment of required work stoppages and consultation checkpoints; and the clear linkage between archaeological activity and environmental permitting thresholds.

This coordination is documented in the Project 205 Procedural Summary Matrix, which cross-references:

- Archaeological work stages,
- CZC Certification requirements,
- Stormwater Pollution Prevention Plan (SWPPP) and Land Disturbance Permit (LDP) prerequisites,
- Required SHPO and SCDES-BCM consultation points, and
- Conditions requiring concurrence or formal approval before advancement.

Based on agency feedback, the College revised the Archaeology Work Plan to:

- Align Stage 1 (Pre-Disturbance GPR) with pre-permit, non-disturbing investigative activities;
- Tie Stage 2 (SWPPP BMP installation and demolition monitoring) directly to LDP authorization requirements, with continuous archaeological monitoring;
- Require post-removal geophysical survey results (Stage 3) to be reviewed by SHPO prior to initiating any exploratory subsurface work;
- Formally incorporate Stage 4 (ground-truthing work and site excavation) as a gated phase requiring SHPO and SCDES-BCM consultation, Research Design approval, and confirmation of municipal cemetery compliance before proceeding.

The revised Archaeology Work Plan, SUBMITTED 3.27.2026, reflects this coordinated framework and ensures that archaeological investigations advance only in step with CZC certification conditions, stormwater and land-disturbance permits, and SHPO advisory review. This approach preserves regulatory clarity, reinforces phased decision-making, and ensures that archaeological, environmental, and cultural resource responsibilities are addressed in a consistent and compliant manner.

--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).

Archaeological Work Plan, Reporting, Table 1, Page 12 – SUBMITTED 3.27.2026

Archaeological Work Plan, Appendix B, Procedural Summary Matrix and Legend, SUBMITTED 3.27.2026

--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.

- Archaeological Work Plan, Archaeological Monitoring, Page 4-5 – SUBMITTED 3.27.2026
- Archaeological Work Plan, Protocol for Unanticipated Discoveries, Page 42-43 - SUBMITTED 3.27.2026

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

- Archaeological Work Plan, Glossary, Page 44-45 – SUBMITTED 3.27.2026

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.

- Archaeological Work Plan, Archaeological Monitoring, Page 4-5 – SUBMITTED 3.27.2026
- Archaeological Work Plan, Protocol for Unanticipated Discoveries, Page 42-43 - SUBMITTED 3.27.2026
- Archaeological Work Plan, Appendix B, Procedural Summary Matrix and Legend, SUBMITTED 3.27.2026

--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.

Acknowledged – 3.27.2026

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

- Archaeological Work Plan, Documenting Archaeological Features, Page 6 – SUBMITTED 3.27.2026

--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).

- Archaeological Work Plan, Protocol for Unanticipated Discoveries, Page 42-43 - SUBMITTED 3.27.2026

--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.

- Archaeological Work Plan, General Grave Excavation and Documentation, Page 18 - SUBMITTED 3.27.2026
- Archaeological Work Plan, Analysis and Reporting, Page 22-23 - SUBMITTED 3.27.2026
- Archaeological Work Plan, Archaeological Analyses, Page 40 - SUBMITTED 3.27.2026

--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.

- Archaeological Work Plan, General Grave Excavation and Documentation, Page 18 - SUBMITTED 3.27.2026
- Archaeological Work Plan, Analysis and Reporting, Page 20 - SUBMITTED 3.27.2026
- Archaeological Work Plan, Archaeological Analyses, Page 38 - SUBMITTED 3.27.2026
- Archaeological Work Plan, Glossary, Page 44-45 – SUBMITTED 3.27.2026

--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.

- Archaeological Work Plan, Archaeological Analyses, Page 8-9 - SUBMITTED 3.27.2026

--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.

- Archaeological Work Plan, Proposed Stages of Work, Page 22 - SUBMITTED 3.27.2026

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

- Archaeological Work Plan, Acronyms, Page V - SUBMITTED 3.27.2026

--p. 11, top, delete “ground” prior to “significant”.

Addressed

--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.

- Archaeological Work Plan, Geophysical Surveys, Page 3 - SUBMITTED 3.27.2026
- Archaeological Work Plan, Appendix B, Procedural Summary Matrix and Legend, SUBMITTED 3.27.2026

--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.

- Archaeological Work Plan, Appendix B, Procedural Summary Matrix and Legend, SUBMITTED 3.27.2026

--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.

Archaeological Work Plan, Geophysical Surveys, Page 25 – SUBMITTED 3.27.2026

--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.

- Archaeological Monitoring, Archaeology Work Plan, Page 4 – SUBMITTED 3.27.2026

--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.

- Archaeological Monitoring, Archaeology Work Plan, Page 4 – SUBMITTED 3.27.2026

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

Addressed

--Pg. 19, Site Security, "decedents", spelling.

Addressed

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

- Archaeological Work Plan, Reporting, Stage 4B, Page 40 – SUBMITTED 3.27.2026

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

- Archaeological Work Plan, Archaeological Monitoring, Page 4 – SUBMITTED 3.27.2026

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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.

- Archaeological and Cemetery Work Plan were revised and recompiled into a singular work plan. Archaeological Work Plan – REVISED AND RESUBMITTED 3.26.2026

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?

The City of Charleston, as the local governing body with jurisdiction over the Potter's Field/Second Official Municipal Cemetery, is aware of Project 205 and its associated cultural and historical considerations. This shared awareness and commitment to responsible stewardship is reflected in the joint opinion piece authored by College of Charleston President Andrew T. Hsu and City of Charleston Mayor William Cogswell, published in The Post and Courier on August 31, 2025, which emphasizes coordination, transparency, and public responsibility regarding the site's future.

While the City has not yet issued a formal determination or provided a finalized list of requirements regarding the removal or relocation of graves, the College continues to coordinate with City staff on project updates and procedural compliance. As noted in the Work Plans and Procedural Summary Matrix, the College has identified the appropriate point at which a formal petition to Charleston City Council would occur, consistent with the requirements of SC Code 27-43-10 through 27-43-40, including public notice.

The Work Plans sequence City Council submission after completion of the post-removal geophysical survey and associated findings, at which point the College will have undertaken the maximum extent of non-invasive and minimally invasive investigation available through current technology and methods. This sequencing also allows for more community engagement, consultation, and information gathering prior to any request for municipal consideration of cemetery removal or relocation.

By staging the City approval process in this manner, the Work Plans account for the City's jurisdictional role, preserve the City's discretion under state law, and ensure that any petition is informed by robust archaeological data, regulatory consultation, and public engagement, rather than preliminary assumptions.

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.

In the College of Charleston Board of Trustees Resolution, the Board has formally recognized the CEC as a critical advisory body guiding the ethical, cultural, and stewardship aspects of Project 205, and has affirmed the importance of transparency, respect, and community engagement throughout the project. In accordance with this directive, engagement with descendant communities, community of care, and the public is structured through a layered and inclusive approach, acknowledging both documented limitations and the need for openness.

To date, no lineal descendants have been formally identified through archival or historical research. Accordingly, and consistent with SC Code 27-43-10 through 27-43-40, required notice related to the proposed removal of an abandoned cemetery will be provided through publicly advertised channels, including newspaper notices and City of Charleston public processes, ensuring that individuals who identify as descendants or members of affiliated communities have the opportunity to become aware of and engage with the process.

In addition to statutory notice requirements, the College will continue to engage descendant and affiliated communities through multiple avenues, including:

- Public updates and documentation posted on the Project 205 / Coming Street Commons website
- Community Outreach Forums held at key project benchmarks, which provide opportunities for dialogue, questions, and public comment
- Ongoing, open CEC meetings, which are publicly noticed and accessible
- Direct outreach and maintained lines of communication with Federally recognized Tribal Nations, undertaken in good faith and without imposed response deadlines

All engagement activities operate within the project's Information Sharing and Feedback Loop, which ensures that information, regulatory reviews, and findings are shared transparently, that feedback and objections are documented and considered, and that adopted recommendations are incorporated through established Work Plan amendment processes.

Amendments to approved work plans may arise through the established information-sharing and feedback loop and may be technical, archaeological, or memorial/commemorative in nature. Proposed amendments will be informed by ongoing project development, investigation results,

and community and CEC engagement, including recommendations generated through consultation activities.

As the consulting agency, all formal requests for amendments to work plans, as well as their ratification, will be submitted to the South Carolina State Historic Preservation Office (SHPO) for review. SHPO may elect to accept, deny, or provide comments requiring revision or further consideration. The College of Charleston acknowledges that this formal ratification process may evolve over the course of the project as development progresses, additional information becomes available, or consultation needs expand.

Together, these mechanisms are intended to ensure that descendant communities and communities of care have meaningful opportunities to receive notice, raise concerns, and provide input, even in the absence of formally identified lineal descendants. This approach reflects both statutory requirements and nationally recognized best practices from comparable projects, including the African Burial Ground National Monument (New York), the Anson Street African Burial Ground (Charleston), and Baldwin Hall (University of Georgia), where layered outreach, advisory councils, public notice, and phased consultation have been used to guide respectful treatment of burial grounds.

Through this integrated framework, the project's methodology addresses descendant engagement, notice, and feedback while maintaining regulatory clarity and a stewardship-based approach consistent with applicable guidance and standards of care.

--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.

- Archaeological and Cemetery Work Plan were revised and recompiled into a singular work plan. Archaeological Work Plan – REVISED AND RESUBMITTED 3.26.2026

The College of Charleston has undertaken good-faith outreach and engagement with Federally recognized Tribal Nations with historical and ancestral connections to South Carolina and the project area. To date, project notification letters have been sent to thirteen (13) Tribal Nations, providing background information on Project 205, the site history, and the potential for encountering archaeological materials and human remains, and inviting dialogue regarding culturally appropriate protocols and procedures.

As part of this engagement, the College has held a one-on-one consultation meeting with representatives of the Muscogee (Creek) Nation, during which project background, anticipated investigative approaches, and project considerations were discussed. In addition, the Catawba

Indian Nation has requested a one-on-one meeting, and the College has responded affirmatively and is currently awaiting further direction regarding scheduling and preferred format.

The College remains committed to maintaining open lines of communication with Tribal Nations throughout the project and recognizes that consultation timelines and participation vary among Tribes. No response deadlines have been imposed. Continued outreach, information sharing, and opportunities for consultation will occur as the project progresses and as additional information becomes available through staged archaeological investigations.

--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.

Archaeological Work Plan, Field Laboratory Requirements, Page 18 – RESUBMITTED 3.27.2026

--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.

Given the College of Charleston's extensive and active presence downtown and immediately adjacent to the project site, the safest and most effective methods for informing, engaging, and directing members of the public or media without compromising site security or the dignity of ongoing archaeological work will be appropriate signage.

The College will install clearly visible on-site signage within the public right-of-way that directs interested individuals to the Project 205 website and the established project email address for questions, comments, and information requests. This approach allows inquiries to be addressed in a controlled, thoughtful manner consistent with the project's Information Sharing and Feedback Loop, while maintaining necessary security and privacy protections for the site.

Media inquiries will be directed to the College's designated communications channel at news@cofc.edu, ensuring prompt, accurate responses through established institutional protocols. The College believes this approach provides an appropriate, consistent, and secure means of public communication while preserving site integrity and respecting the sensitive nature of the work taking place.

--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?

Archaeological Work Plan, Field Laboratory Requirements, Page 18 – RESUBMITTED 3.27.2026

--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.

- Archaeological Work Plan, Unit Excavation, Page 5-6 – SUBMITTED 3.27.2026

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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.

- Professional Examination Plan, SUBMITTED 3.27.2026

--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.

- Cemetery and Commemoration Work Plan of 106 Coming Street, Revised and SUBMITTED 3.27.2026

--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.

- Cemetery and Commemoration Work Plan of 106 Coming Street, Task 1: Community Engagement, Page 3-4 - SUBMITTED 3.27.2026

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

- Cemetery and Commemoration Work Plan of 106 Coming Street, Conclusion, Page 7 - SUBMITTED 3.27.2026

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

--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.

Acknowledged – 3.27.2026

SHPO recommended conditions:

- To be revised based off revised and resubmitted Work Plans 3.27.20206

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.

SHPO Correspondence #4 with Supplemental Responses

Justin, Sara, good afternoon,

We have received per the below March 27, 2026 email the latest revised work plans (*Professional Examination Plan* dated March 27, 2026*, Archaeological Work Plan* dated March 27, 2026*,* and *Cemetery and Commemoration Work Plan* dated March 27, 2026/Rev. April 8, 2026) associated with our review of "Project 205 New Construction" (SCDES-BCM Reference No. HQE-MAZM-OBJ2E and SHPO Project Number 25-JS0212). The revised work plans are provided in response to our comments to date on the referenced Project, as well as to comments provided to date by Stakeholders and other interested parties on the referenced Project that have been provided to or shared with our office.

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.

General Comment for all plans

Please provide a final copy of each final Work Plan to our office and SCDES-BCM within thirty (30) days of receipt of our comments herein on each Work Plan. Please also address comments on the latest revised Work Plans provided by the public, Stakeholders or other interested parties. Additional consultation with the SHPO will be needed if any final Work Plan revisions based on comments by the public, Stakeholders or other interested parties propose changes to professional examination or archaeological work methodologies. Our office will accept the final Work Plans as revised and resubmitted as baseline final copies of each Work Plan, to serve as the baseline for any future proposed revisions or amendments, in accordance with the applicable CZC condition.

- CofC: Noted

Change/Revise the "Prepared for:" language on all work plan cover pages to the client, the College of Charleston, not the South Carolina Department of Archives and History.

- Professional Examination Work Plan (1of3 Work Plans) – Complete
- Archaeological Work Plan (2of3 Work Plans) – Complete
- Cemetery and Commemoration Work Plan (3of3 Work Plans) – Complete

Please append all SHPO comments provided to date on all the work plans. This was only done for the Commemoration Plan.

- Professional Examination Work Plan (1of3 Work Plans) – Complete

- Archaeological Work Plan (2of3 Work Plans) – Complete
- Cemetery and Commemoration Work Plan (3of3 Work Plans) - Complete

Please ensure SC Code 16-17-600 and 16-11-780 are cited in addition to SC Code 27-43-10 through 27-43-40 in all work plans, procedural summary legend, and the example cultural resource site pamphlet.

- Professional Examination Work Plan (1of3 Work Plans) – Complete
- Archaeological Work Plan (2of3 Work Plans) – Complete
- Cemetery and Commemoration Work Plan (3of3 Work Plans) – Complete – Located in Appendix L: Procedural Summary Matrix and Legend

Conduct a check for typos, missing words, misspelled words, grammar, etc.

- Professional Examination Work Plan (1of3 Work Plans) – Complete
- Archaeological Work Plan (2of3 Work Plans) – Complete
- Cemetery and Commemoration Work Plan (3of3 Work Plans) – Complete

Professional Examination Plan – (1 of 3 Work Plans)

Page 3, delete last sentence of the first paragraph – we have already provided these additional comments; second paragraph, “Chritine”, spelling.

- Complete

Cemetery and Commemoration Plan - (3 of 3 Work Plans)

Front cover date vs header date, revise (i.e. cover states March 27, 2026, header date states January 8, 2026).

- Complete

Page 6: 2nd paragraph, “documented limitations” what does this reference?

- CofC Response: “In accordance with this directive, engagement with descendant communities, communities of care, and the public is structured through a layered and inclusive approach that acknowledges both the complexities of identifying and representing all connected communities and the need for openness.”

Page 12: 1st paragraph “Investigations1”.

- Complete

Considering the number of appendices and the size of the overall document, consider for easier navigability bookmarking the sections of the plan and the appendices as links within the Table of Contents. Also, add the descriptive name/title of the appendix to the applicable appendix divider pages.

- Complete, viewers can hover over appropriate text to find the navigation icon to jump to the referenced document.

Appendix N-ACHP Policy Statement, last paragraph states project is not subject to NAGPRA, suggest rephrasing as the language used elsewhere in the work plans does not make such a declarative statement.

- Revised - Complete

Archaeological Work Plan

Page i, bottom paragraph vs Page 1 bottom two paragraphs: compare and perhaps just repeat the page i paragraph on Page 1 or merge to include all methods and processes are cited, ensuring the inclusion of language for the excavation of burials; is a reference to Appendix B here on Page 1 accurate?; "intitled" spelling.

- 1) All of the language in the Page i paragraph is now included on Page 1; 2) Deleted Appendix B language; 3) Revised to "in the".

Page iii: check Table of Contents formatting and spacing, appears to be missing "Site Security", cemetery work plan should be "Cemetery Archaeology", unbold proposed stages of work and appendices.

- Reformatted TOC.

Doublecheck throughout the language regarding the establishment of the site grid, for consistency and timing.

- Revised language in places to indicate that initial grid established during Stage 2a.

Check the appended glossary vs the Legend terms in Appendix B.

- Revised work plan glossary to include terms and definitions that appear in both the work plan and Appendix B.

Please append all SHPO comments provided to date on the work plans.

- Added as APPENDIX K:SHPO Correspondence

Page 3: why is the amendment process referred to the Cemetery and Commemoration Plan only, here as Appendix C, where it does not appear to be? The amendment details should be in the Archaeological Work Plan.

- Revised to include similar language summarizing the amendment process.

Page 4: first use of SWPPP, spell out.

- Corrected.

Page 5, Site Security: this section and/or the site fencing and security plan should include notice of trespassing in accordance with SC Code of Laws 16-11-600.

- Language was added to both sections, including adopting Proof of Posting forms.

Page 6: states site fencing and security plan will be provided to SHPO for review, please add this to the Procedural Summary Matrix.

- Added to the Procedural Summary matrix under Deliverables/Reporting under Stage 2.A. Site fencing specifications and layout are predetermined and defined within the SWPPP site plan drawings that is reviewed and approved through the City of Charleston Land Disturbance Permit process. The College of Charleston will include additional site logistics and security plan along with the SWPPP for SHPO for review.

Page 10: 1st paragraph, period at end of sentence.

- Period added.

Page 15: 1st paragraph, "given" rather than "giving".

- Corrected.

Page 16: 3rd paragraph, 1st sentence appears to need editing.

- Edited to update language.

Page 18: 2nd paragraph, please revise to reflect that remains will not be removed during geophysical enabling demolition. Please revise 3rd paragraph to reflect that during archaeological investigations, which will only happen after the City of Charleston has given approval pursuant to state code 27-43-10.

- Revised to reflect remains will not be removed during geo survey, and clarified language regarding City of Charleston approval pursuant to 27-43-10.

Page 24: last sentence of Stage 1, add "and the College of Charleston" at the end of the sentence after "independent researcher"; 1st paragraph, in description of Stage 2A, add in establishment of site grid to be consistent with the Procedural Summary Matrix.

- Added CoC following "independent researcher"; added language in Stage 2A (following silt fencing description) to add the site grid.

Page 27: Suggest adding the proposed meeting between Terracon and SHPO to the Procedural Summary Matrix.

- Listed as a Predecessor for Stage 3 within the Procedural Matrix to schedule (virtual) meeting with SHPO to review Geophysical Methodology prior to site work with Terracon.

Page 42: 2nd paragraph, see page 4, and evaluate for consistency, page 4 gives a 25m distance while page 42 doesn't; last sentence, revise "transfer the remains per the protocols outlined above" to be more specific.

- 1) Revised language on Page 42 to indicate that work should cease within a 25-meter perimeter of any remains. 2) clarified to state remains would temporarily be transferred to Terracon lab and turned over to certified funeral director.

Appendix F-SHPO Correspondence #3 with Supplemental Responses, states that the College "notes that if it is ultimately determined that a residence hall cannot be constructed at this site, the College will not proceed with development and the property would be sold under its existing

entitlement and zoning requirements." How would selling the property if the desired project cannot be constructed be consistent with the College's stated commitment to responsible stewardship of the site?

- CofC Response:
  The College of Charleston's commitment to responsible stewardship includes preserving, studying, and appropriately commemorating the site's historical and cultural significance. At the same time, the College of Charleston, as a state agency, also has a responsibility to ensure that its limited resources are used in ways that advance its educational mission and serve students, faculty, staff, and the broader public. Retaining ownership of a property that cannot be used to support the campus or its mission would not be fiscally responsible.
  If the standard for stewardship is that the property can never be developed or disturbed in any way, then the College may not be the appropriate long-term steward of the site. The College's vision for stewardship has always contemplated a balance: honoring and memorializing the site's history while allowing for thoughtful, legally compliant, and mission-supporting use of the property. Importantly, if it became necessary for the College to sell the property, the College would take steps to ensure that its stewardship commitments are upheld. This could include the use of deed restrictions, conservation-oriented measures, or other enforceable mechanisms to require continued consideration of the site's historical significance.
  In addition, existing City of Charleston approvals establish requirements for commemoration of the site. Board of Architectural Review (BAR) stipulations and Planned Unit Development (PUD) conditions require incorporation of physical commemoration elements associated with the site's history, including interpretation of the former YWCA. Any future actions affecting the property would remain subject to applicable state and local laws and processes, including public review regarding the treatment of human remains and decisions about reinterment.
  Accordingly, the College's position is that responsible stewardship is defined not solely by continued ownership, but by ensuring that the site's historical significance is appropriately documented, respected, and commemorated over the long term, whether under College ownership or through enforceable protections applied in connection with any future transfer.

Matrix/Legend

Matrix: SHPO will have 15 days to review the measured drawings, not 14.

- CofC: Revised

Edit the two cemetery law references in the Legend for consistency.

- CofC: Revised

Legend: How is the CEC to provide recommendations for SHPO consideration?

- CofC Response: Please note the additional term and definition under the Matrix Legend Reports/Deliverables "Monthly Informational Exchange Packet" as follows:

- A recurring submission from the College of Charleston to SHPO providing ongoing project updates and information sharing, including summaries of Community Engagement Council (CEC) discussions and motions, stakeholder input, and project developments. The Exchange Packet supports transparency and keeps SHPO apprised of engagement outcomes and evolving project conditions, while formal recommendations are transmitted separately through Work Plan amendments submitted by the College for review, comment, and approval from SHPO.

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.