

PRESERVATION
ESTD SOCIETY 1920
of CHARLESTON

August 20, 2025

Sara W. Barbagallo, Coastal Zone Consistency Project Manager
South Carolina Department of Environmental Services - Bureau of Coastal Management
1362 McMillan Ave., Suite 400
North Charleston, SC 29405

Via Email: Sara.Barbagallo@des.sc.gov

Re: Project 205 New Construction, Application Number HQE-MAZM-0BJ2E

Dear Ms. Barbagallo,

This comment concerns the College of Charleston's permit application for early site work to facilitate a new student housing project at 106 Coming Street. We believe the site has significant historic and cultural value that has not been fully evaluated by the State, and that any approvals should be deferred pending greater public awareness and education. By means of this correspondence, we request a public hearing on this controversial application and urge DES-BCM to exercise caution prior to issuing its approval.

Statement of Interest

The Preservation Society of Charleston (PSC) is a 501(c)(3) nonprofit organization founded in 1920 and dedicated to serving as a strong advocacy leader for preserving the distinctive character, quality of life, and diverse neighborhoods of the Charleston region. In October 2024, the PSC launched the Mapping Charleston's Black Burial Grounds Project, a community-led initiative in partnership with the Anson Street African Burial Ground Project focused on identifying threatened gravesites in the City of Charleston. The digital map developed as part of the project aims to increase public awareness of Black burial grounds to strengthen protections for these sacred spaces as Charleston grows and develops.

Historic Significance of Site

Based on recent historic reports commissioned by the applicant, the project location contains a portion of a large public burial ground dating to the 1790s and early 1800s, estimated to contain between 4,600 and 12,000 individuals.¹ These reports also indicate the following pertinent facts:

¹ BVL Historic Preservation Research ("BVL"), "Public Burial Ground (1790s-1807) Coming, Vanderhorst & Calhoun Streets Charleston, SC," Prepared for College of Charleston (July 2025), p.19, *citing* S&ME, Inc. "Historic Research and Geophysical Assessment of 106 Coming Street and 99 St Philip Street, Charleston, South Carolina, S&ME Project No. 24130280." Charleston, SC (2024). These documents have been made available on the College's project website at the following link: <https://coming-street-commons.charleston.edu/cultural-preservation/>.

PRESERVATION
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- Historic maps indicate that a southern portion of the burial ground reserved for the interment of free persons of color and enslaved individuals is directly beneath the area to be developed.
- The public burial ground was filled with human remains and subsequently closed in late summer in 1807, months before the federal ban on importation of enslaved Africans. In the four immediate years before this ban, while this burial ground was in operation, the City of Charleston is estimated to have received as many of 45,000 captive Africans in approximately 270 voyages.²
- Many of the enslaved individuals who did not survive the journey from Africa to the Americas, or who died soon after arrival, are interred at the project site.
- The portion of the former burial ground at the project location is considered to have “relatively minimal subsurface impact compared to the more heavily developed sections of the surrounding parcels.”³
- An 1801 City of Charleston ordinance standardizing interments within the burial ground identified the site as a burial ground for “mestizos,” a term used at the time to refer to individuals of mixed Indigenous ancestry, many of whom were also enslaved.⁴

Notably, this is largely new information to the Charleston community, building on previous research conducted by Dr. Nic Butler and the Chicora Foundation.⁵

Without further public discussion, it remains unclear whether the draft archaeological work plan is framed within the broader historic context. We urge that care be provided and suggest references in the discoveries made at New York City’s African Burial Ground National Historic Landmark and Richmond, Virginia’s Shockoe Hill African Burying Ground, a contributing feature of the Shockoe Hill Burying Ground Historic District, listed on the National Register of Historic Places at the national level of significance.

Archaeological Plan

The proposed investigative efforts described in the permit application reference proposed “recovery work” for human remains and excavation of the site in accordance with guidelines in a previously undisclosed work plan. The “archaeological notice to contractor” on page two refers to a draft work plan that the applicant’s consultant Terracon, Inc., has submitted to SHPO for review. There is also a reference in the project description to the proposed “installation of test piles” on the site which is not further described.

² Nic Butler, “The Story of Gadsden’s Wharf.” Charleston Time Machine, podcast. Episode 51, 2 February 2018. Transcript available at: <https://www.ccpl.org/charleston-time-machine/story-gadsdens-wharf>.

³ BVL at 22.

⁴ BVL at 15.

⁵ Michael Trinkley, et al., *The Silence of the Dead: Giving Charleston Cemeteries A Voice* (Columbia, S.C.: Chicora Foundation, 2010); Nic Butler, “The Forgotten Dead: Charleston’s Public Cemeteries, 1794–2021.” Charleston Time Machine, podcast, Episode 201, 7 May 2021. Transcript available at: <https://www.ccpl.org/charleston-time-machine/forgotten-dead-charlestons-public-cemeteries-1794-2021/>

PRESERVATION
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All of these items warrant better public understanding before DES renders an approval. Given the presence of a vast number of known human burials on site, the State has a responsibility to ensure that the descendant community has a full understanding of the project scope. The draft work plan has not been previously disclosed publicly or made available, and there is considerable interest from the community in this issue.⁶

Conclusion

The Preservation Society of Charleston respectfully requests that DES-BCM carefully consider this information and exercise caution in the permit review process to ensure that human remains are protected from harm and the community is fully aware of any action being taken that would cause harm. Please contact me at bturner@preservationsociety.org should you have further questions or concerns.

Sincerely,



Brian R. Turner
President & CEO

Cc: Rob Larsen, Archaeologist, SC SHPO (rlarsen@scdah.sc.gov)
Laura Lee Worrell, College of Charleston (worrelllll@cofc.edu)

⁶ Local community members have partnered in the development of a website to inform the public of the issue at <https://protectrespectbodies.com/>.