

IN THE COLLEGE'S OWN WORDS

PRESERVE 106 | COMING STREET, CHARLESTON

Historical illustration

COLLEGE PROJECT QUESTIONS AND ANSWERS

Selected exact excerpts retrieved October 16, 2026

1 KNOWLEDGE BEFORE PURCHASE

Question summarized: Did the College know the Young Women's Christian Association and burial-ground history during negotiations and before purchasing the properties?

"Yes. The College was also aware of the site's history"

Exact excerpt from the answer. The remainder identifies the January 2025 purchase and discusses development at former burial sites subject to applicable laws.

2 CONSULTATION BEFORE PURCHASE

Question summarized: Did the College consult the community most connected to the Young Women's Christian Association and burial ground before buying the property?

"No."

Exact opening of the answer. The response then describes planned and ongoing engagement after purchase and discusses identifying those buried there and their descendants.

THE CITY MUST CONSIDER OBJECTIONS TO REMOVAL

For grave removal under South Carolina Code §27-43-10, the county or municipal governing body must consider objections before approving removal and must determine that removal is necessary and expedient. Ask Charleston City Council to oppose removal and support preservation in place.

SOURCES: COLLEGE RESPONSES AND STATE CEMETERY LAW

Frequently Asked Questions → Property Acquisition
coming-street-commons.charleston.edu/faqs/

Questions are summarized; quoted answer excerpts are reproduced verbatim.

Answer excerpts retrieved October 16, 2026.

State law: scstatehouse.gov/code/t27c043.php



NO REMOVAL. PRESERVE IN PLACE.

THE LAND HAD A PRICE. THE PEOPLE ARE PRICELESS.



PRESERVE 106 | 106 COMING STREET, CHARLESTON

Historical illustration

\$28.7 MILLION

Appraised value of 106 Coming Street in June 2024. [1]

\$75 MILLION

Combined purchase price for 106 Coming Street and 99 St. Philip Street, acquired January 30, 2025. The purchase included an existing apartment building. [1]

These figures value real estate. They are not a purchase price for human remains.

WHAT THE COLLEGE ACKNOWLEDGES

It knew the history before buying. The College states that it was aware of the Young Women's Christian Association and burial-ground history when it purchased the properties. [2]

It did not consult beforehand. Asked whether it consulted the community most connected to the Young Women's Christian Association and burial ground before purchase, its published questions and answers state, "No." [2]

NO REMOVAL. PRESERVE IN PLACE.

Ask City Council, state legislators and the College to leave it undisturbed.

READ THE RECORDS

[1] South Carolina Joint Bond Review Committee, March 26, 2025 agenda, printed pages 116-117: scstatehouse.gov/agendas/126j15189.pdf

[2] College project questions and answers, "Property Acquisition": coming-street-commons.charleston.edu/faqs/



WHAT THE GROUND-PENETRATING RADAR REPORTS SAY



Symbolic artistic illustration; not a photograph of the Coming Street survey.

Ground-penetrating radar helps researchers look below the surface without digging. The College has made its survey reports public. [1, 2, 3]

2024 | FIRST STUDY

Soil conditions and later use of the land made individual burials difficult to identify. An unclear result does not mean no one is buried there. [1]

2026 | SECOND STUDY

Features may indicate burials. The report says they had not been checked by excavation. It does not establish how many people remain buried here. [2]

WHAT THE HISTORICAL REPORT SAYS

A report prepared for the College of Charleston cites estimates of 4,600-12,000 people across the historic cemetery. [4] This covers the larger burial ground, not a count of burials identified by radar at 106 Coming Street.

INCONCLUSIVE DOES NOT MEAN EMPTY.

[1] Historic Research and Geophysical Assessment, November 12, 2024, pages 25, 36.

[2] Three-dimensional radar report for Coming Street Commons, public redacted copy, October 2026; printed pages ix, 24, 36. [3] College project website, Process and Transparency.

[4] Public Burial Ground (1790s-1807), prepared for the College, July 2025.

Reports: coming-street-commons.charleston.edu/process-and-transparency/



Scan historical report

PRESERVE 106. NO REMOVAL.

WHAT DOES REMOVAL MEAN?



Symbolic artistic illustration; not an actual event or a reconstruction of the site.

THE PEOPLE. THE PLACE.

The ancestors remain present in our remembrance of this burial ground.

This symbolic artwork connects their lives and resting places with what removal would mean.

THEY WERE PEOPLE. THIS WAS THEIR RESTING PLACE.



Illustrative removal scenario; not evidence that removal has occurred at Coming Street.

REMOVAL IN PHYSICAL TERMS

The College's published questions and answers describe documenting people in their graves, recovering their remains and associated materials, and placing them in individual containers. [1]

If City approval is granted, individuals may be disinterred and reinterred elsewhere. [1]

WHAT THE PROJECT INVOLVES

The South Carolina Department of Environmental Services describes pavement removal, archaeological recovery and test piles for future student housing. [2] The College describes radar survey, excavation to check findings, and documentation. [3]

REBURIAL CHANGES THEIR RESTING PLACE.

People removed and reburied would no longer rest in their original graves. The College's published questions and answers say the search for a reinterment site remains ongoing. [1]

CHARLESTON HAS A DECISION TO MAKE.

Under South Carolina Code §27-43-10, the governing body must consider objections before approving removal under that statute. [4]

PRESERVE 106. NO REMOVAL.

[1] coming-street-commons.charleston.edu/faqs/ [2] South Carolina Department of Environmental Services, Project 205 Early Site Package fact sheet (2025).

[3] College project website, Process and Transparency, Phase 3. [4] scstatehouse.gov/code/t27c043.php

Both images are artistic illustrations, not site reconstructions.

Sources checked October 16, 2026.

WHAT DO THE WORK PLANS MEAN?

106 COMING STREET | COLLEGE OF CHARLESTON & TERRACON

These plans describe how the College's project would be documented and investigated. Their titles cover different work. Read the scope, methods and conditions together.

1 WHO IS DOING WHAT?

The College is the project applicant. Terracon prepared the May 26, 2026 plans for the College. State agencies review the work within their authority; Terracon is the College's consultant. [1, 2, 3]

2 PROFESSIONAL EXAMINATION PLAN: THE BUILDING

This plan addresses the former Young Women's Christian Association building: its history, photographs, measured drawings, salvaged materials and commemoration. It states that burial-ground memorialization is outside this plan's scope. Building documentation is distinct from preserving burials in place. [1, pp. 1-5]

3 ARCHAEOLOGICAL WORK PLAN: BELOW THE GROUND

This plan covers radar and other surveys, monitoring, test excavation, larger excavation, documentation and analysis. Its cemetery section includes removing and examining human remains if the necessary approvals are obtained. This work extends beyond scanning the pavement. [2, pp. 1-4, 14-22, 23-39]

4 WHAT WOULD HAPPEN TO RECOVERED REMAINS?

The plan describes measurements and photographs, temporary storage at Terracon's Charleston office with funeral-director approval, and records tracking transfers. Genetic testing that destroys samples is outside the current work plan; any proposed change needs separate scrutiny. The plan acknowledges that the City may decline removal or the College may decide not to develop the site. [2, pp. 1, 18-22]

Public accountability: identify the current versions, written approvals, proposed changes and the conditions that must be met before each stage.

READ THE PLANS AND THEIR STAGES
[coming-street-commons.charleston.edu/
process-and-transparency/](https://coming-street-commons.charleston.edu/process-and-transparency/)



PRESERVE 106. NO REMOVAL.

Sources: [1] Professional Examination Plan, May 26, 2026. [2] Archaeological Work Plan, May 26, 2026.
[3] Coastal Zone Consistency Determination, May 7, 2026. Page references are the plans' printed pages.
Independent preservation handout | Sources reviewed October 16, 2026.

Illustration is symbolic; not a photograph or an actual project record.

BEFORE BURIALS CAN BE REMOVED

106 COMING STREET | THREE REQUIREMENTS THE PUBLIC SHOULD KNOW

The state's May 7, 2026 Coastal Zone Consistency determination sets conditions for this project. These requirements govern burial removal and the excavation stages. [1]

1 THE CITY MUST APPROVE REMOVAL.

The City of Charleston must approve removal of the cemetery or burial ground. Test excavation to check survey results and site excavation cannot begin without that approval. [Conditions 14-15]

2 THE REQUIRED STATE REVIEW MUST OCCUR.

The South Carolina State Historic Preservation Office and South Carolina Department of Environmental Services must have the opportunity to review and approve the draft research design and revised archaeological work plan before human remains or associated burial items are collected, removed or excavated. [Condition 14]

3 BEFORE CITY APPROVAL: LEAVE REMAINS HERE.

When human remains are discovered before City approval, they must stay on site and be reburied in place. Their location must be recorded. [Condition 14]

OTHER SAFEGUARDS CONTINUE THROUGHOUT THE WORK.

The determination also requires monitoring, reports, specified review periods, public updates and consultation. Archaeological monitors have authority to halt construction for investigation. [Conditions 2-3, 7-9, 12-13]

REQUIREMENTS ARE NOT PROOF OF COMPLIANCE.

Ask the agencies for written confirmation of the current work stage, which conditions have been met, and the approvals allowing the next step.

STATE PROJECT RECORDS
des.sc.gov
Search: College of Charleston Project 205



PRESERVE 106. NO REMOVAL.

WHO IS CHECKING?

**CONDITIONS REQUIRE OVERSIGHT.
THE PUBLIC DESERVES TO SEE IT.**

The state's May 7, 2026 determination requires reports, review periods and safeguards before specified stages of work. Archaeological monitors have authority to halt construction for investigation. [1]

1 WHO CHECKS COMPLIANCE?

REQUIRED: The College must provide specified reports and materials for agency review. [Conditions 3, 8]

THE PUBLIC SHOULD SEE: Who verifies each requirement, the records reviewed, and the written findings before the next stage.

2 WHO CAN HALT THE WORK?

REQUIRED: Archaeological monitors must have authority to halt construction for investigation and reporting. [Conditions 12-13]

THE PUBLIC SHOULD SEE: How that authority works on site, who receives a violation report, and who decides when work may resume.

3 WHAT HAPPENS WHEN A CONDITION IS NOT MET?

REQUIRED: Burial excavation and removal are restricted pending the specified City approval and state review. [Conditions 14-15]

THE PUBLIC SHOULD SEE: The enforcement process: who investigates, what corrective action is required, and what legal penalties apply.

4 WHERE CAN THE PUBLIC SEE THE RECORD?

REQUIRED: The determination calls for public updates and ongoing reporting. [Condition 8]

THE PUBLIC SHOULD SEE: Dated compliance findings, approvals, unresolved issues, and a clear contact for reporting concerns.

BEFORE WORK ADVANCES, SHOW THE COMPLIANCE RECORD.

Ask the responsible agencies to identify the current work stage, who verified compliance, and the decision allowing work to advance.

STATE PROJECT RECORDS

<https://des.sc.gov/community/community-engagement/environmental-sites-projects/college-charleston-project-205>



PRESERVE 106. NO REMOVAL.

Source [1]: Coastal Zone Consistency Determination, May 7, 2026, reference HQE-MAZM-0BJ2E, conditions 3, 8, 12-15. Selected conditions summarized. The complete determination controls; it is not itself a permit.

Independent preservation handout | Symbolic illustration; not a photograph of actual work.

WHAT THE AGENCIES ACTUALLY SAID

106 COMING STREET | WRITTEN AGENCY STATEMENTS

TECHNICAL REVIEW IS NOT REMOVAL APPROVAL.

The National Park Service and South Carolina State Historic Preservation Office explained the limits of their roles. Their written statements distinguish advice and review from authority to approve cemetery removal.

NATIONAL PARK SERVICE

“has not provided any authorization or approval for this project”

Exact excerpt, October 9, 2026 agency response. [1]

Its program administering the Native American Graves Protection and Repatriation Act said it provided technical assistance. It said it could not advise on cultural-monitor funding or requirements under that law and recommended guidance on state requirements and permitting. [1]

SOUTH CAROLINA STATE HISTORIC PRESERVATION OFFICE

“do not denote acceptance or approval of the removal of human remains”

Exact excerpt concerning its review comments, February 18, 2026. [2, p. 1]

The office explained that review of work-plan methods does not approve cemetery removal. It also said consultation with its office does not replace consultation with tribes, local government or the public. [2, pp. 1, 3]

THE COLLEGE STILL HAS RESPONSIBILITIES.

The state office places responsibility for cemetery-law compliance and ethical treatment with the College. City removal approval and the state reviews specified in the May 7 determination remain separate requirements. [2, 3]

ASK FOR THE ACTUAL WRITTEN APPROVALS.

Which agency approved which activity, under what authority, and subject to which conditions?

READ THE STATE OFFICE’S COMMENTS
Scan for the February 18, 2026 public record.



PRESERVE 106. NO REMOVAL.

NEW INFORMATION. THE PLANS MUST RESPOND.

106 COMING STREET | EVIDENCE SUBMITTED FOR AGENCY REVIEW

THE STATE'S CONDITIONS ADDRESS NEW INFORMATION.

A September 29, 2026 notice submitted historical records and requested further review by the South Carolina State Historic Preservation Office and South Carolina Department of Environmental Services. [1]

1 WHAT INFORMATION WAS SUBMITTED?

The notice supplied federal, municipal and historical records concerning a Marine Hospital arrangement and federal payments to the City for seamen's care, including death and burial expenses. It also supplied a request for review by the United States Department of Health and Human Services. [1]

2 WHAT DID THE SUBMISSION ASK THE AGENCIES TO DO?

Add the evidence to the project record, review its implications for burial protection, address it in the work plans and research design, and provide interim preservation while the federal inquiry is considered. These are the requests made in the submission. [1]

3 WHAT DOES CONDITION 7 REQUIRE?

The May 7, 2026 Coastal Zone Consistency determination requires work-plan amendments to reflect new information, evolving circumstances or input from agencies and interested parties. The College submits amendments for review and comment. The state agencies may accept, deny or require revisions or further consideration. [2, condition 7]

4 WHAT SHOULD THE PUBLIC BE ABLE TO SEE?

A written agency response identifying the evidence reviewed, whether amendments are needed and why, and how the evidence affects the next stage of work. The public should also be able to identify the current plans, applicable conditions and approvals before work advances.

The submission presents evidence and requests agency decisions. It does not establish that the agencies have issued a new ruling or ordered a stop to work.

STATE PROJECT RECORDS
des.sc.gov
Search: College of Charleston Project 205



PRESERVE 106. NO REMOVAL.

WHY THIS SITE? SHOW THE COMPARISON.

106 COMING STREET | COLLEGE OF CHARLESTON

HOW WAS LEAVING THE BURIALS IN PLACE EVALUATED?

A College harm-avoidance assessment appears in the January 2026 archaeological work plan. It discusses other housing options and the ground disturbance expected from new construction. [1]

1 THE OPTIONS AND THE DATE

PUBLISHED RECORD: The assessment discusses other properties, smaller housing projects, leases and hotel options. Reasons include cost, size, ownership and timing. [1]

WHAT WOULD MAKE THE COMPARISON CLEAR: A dated, current comparison showing when each option was evaluated, available housing capacity, assumptions, and why each was accepted or rejected.

2 THE COSTS AND THE ASSUMPTIONS

PUBLISHED RECORD: The assessment cites financial feasibility and the scale of housing development among its reasons for ruling out options. [1]

WHAT WOULD MAKE THE COMPARISON CLEAR: Comparable estimates for purchase, construction, borrowing, archaeology, removal, reburial and future care, with dates, uncertainties and underlying assumptions.

3 THE EVALUATION OF PRESERVATION IN PLACE

PUBLISHED RECORD: The assessment describes building foundations and underground stormwater vaults as causes of ground disturbance for new construction. [1]

WHAT WOULD MAKE THE COMPARISON CLEAR: How leaving the burials undisturbed was compared with building here, including a different location, smaller or redesigned housing, or no new construction on the burial ground.

A CONCLUSION NEEDS AN EXPLANATION THE PUBLIC CAN CHECK.

Ask the College to publish a clear comparison and explain whether preserving the burials can change the project's location, size or design.

READ THE COLLEGE'S PROCESS PAGE
[coming-street-commons.charleston.edu/
process-and-transparency/](http://coming-street-commons.charleston.edu/process-and-transparency/)



PRESERVE 106. NO REMOVAL.

PUBLIC INPUT. COLLEGE CONTROL.

106 COMING STREET | WHAT THE COLLEGE'S WEBSITE SAYS

THE COLLEGE DIRECTS THE PROCESS.

The College calls the Community Engagement Council advisory. Its published framework defines the Council's role while housing planning continues under College direction. [1, 2]

HOW CAN THE COUNCIL FUNCTION INDEPENDENTLY?

The concern: College control undermines the Council's ability to influence the outcome.

1 THE PUBLISHED PROCESS PROVIDES FOR REMOVAL

The College continues planning housing on the burial ground. Its published process provides for removal and reburial with City approval, without a commitment to leave the burials in place. [1, 2]

2 HOUSING PLANNING CONTINUES DURING ENGAGEMENT

The College says its trustees and administration directed housing planning to continue while community engagement and regulatory review take place. [2]

3 THE COLLEGE RETAINS FINAL DECISIONS

The Council makes recommendations. The College's trustees and administration retain final decision-making authority within applicable law. [1, 2]

The College also says public input can shape decisions and the Council cannot replace broader engagement. City approval would still be needed for removal and reburial. [1, 2]

THE PUBLIC NEEDS MORE THAN A MEETING.

Ask the College to state publicly whether preservation in place can change the housing plan, and to publish its responses to Council recommendations and objections to removal.

READ THE COLLEGE'S OWN DESCRIPTION

[coming-street-commons.charleston.edu/
community-engagement-council/](http://coming-street-commons.charleston.edu/community-engagement-council/)



PRESERVE 106. NO REMOVAL.

PUBLIC PROJECT. PUBLIC ANSWERS.

106 COMING STREET | COLLEGE OF CHARLESTON

TRANSPARENCY TAKES MORE THAN A WEBSITE.

A public college should explain its decisions with records the public can examine. The College publishes reports and meeting information. The public also needs to understand how evidence and objections affect the plan.

1 WHY THIS SITE? WHY REMOVAL?

WHAT THE COLLEGE SAYS: Its questions-and-answers page says there is no feasible alternative site near its main campus. [1]

WHAT THE PUBLIC SHOULD BE ABLE TO SEE: The dated alternatives analysis, costs and assumptions, and a clear explanation of how leaving the burials in place was evaluated.

2 WHAT HAPPENS TO PUBLIC OBJECTIONS?

WHAT THE COLLEGE SAYS: Trustees and administrators make final decisions, informed by the Council, experts, agencies and the public. [1, 2]

WHAT THE PUBLIC SHOULD BE ABLE TO SEE: The Council's objections and recommendations, the College's responses, and a clear record of unresolved disagreements over preserving the burials in place and the project's direction.

3 WHAT REMAINS UNDECIDED?

WHAT THE COLLEGE SAYS: Its process page lists treatment protocols, funeral directors, and reburial approaches and locations among matters still under review. [2]

WHAT THE PUBLIC SHOULD BE ABLE TO SEE: The current approved plans, required approvals, responsibilities, costs, and the decisions that must be settled before burials could be disturbed.

PUBLIC PARTICIPATION SHOULD CHANGE DECISIONS.

Ask the College to make its reasoning and responses easy to find, with dates, current versions and clear explanations of changes.

READ THE COLLEGE'S PROCESS PAGE
[coming-street-commons.charleston.edu/
process-and-transparency/](http://coming-street-commons.charleston.edu/process-and-transparency/)



PRESERVE 106. NO REMOVAL.

JOIN THE DISCUSSION. SPEAK FOR THE ANCESTORS.



Symbolic artistic illustration; not a photograph of the site or a meeting.

THE PUBLIC IS WELCOME TO ATTEND.

Attend a Community Engagement Council meeting about the burial ground at 106 Coming Street. The Council advises the College of Charleston. [1]

THURSDAY, NOVEMBER 12, 2026

Community Engagement Council meeting

Time and location not yet listed. Check for updates before attending. [2]

THURSDAY, DECEMBER 3, 2026

6 p.m. | Community Engagement Council meeting

School of Education Alumni Center
86 Wentworth Street, Charleston [2]

Ask how to submit comments or speak. Public attendance does not guarantee a speaking slot. Confirm meeting details before traveling.



CAMPAIGN UPDATES
Request to join our mailing list.
[groups.google.com/g/
protect106coming-updates](https://groups.google.com/g/protect106coming-updates)

CONFIRM MEETING DETAILS
Email the campaign before traveling.
protect106coming@gmail.com

PRESERVE 106. NO REMOVAL.

PRESERVE 106

LEAVE THE BURIAL GROUND UNDISTURBED

106 Coming Street, Charleston, South Carolina

Historical illustration

WHO TO CONTACT

Contact these public offices to support preservation in place.

1 CHARLESTON MAYOR & CITY COUNCIL

Ask: Preserve the burial ground in place. Oppose approval of grave removal.

Mayor's Office
Cogswellw@charleston-sc.gov
843-724-7396
City Council / Clerk of Council
843-724-3727

Meeting participation: innovate.charleston-sc.gov

3 COLLEGE OF CHARLESTON BOARD OF TRUSTEES

Ask: Change development plans to preserve the burial ground and those buried there in place.

Through the Board's Executive Secretary:
kassebaume@cofc.edu | 843-953-5500
Request distribution to the full Board.

2 SOUTH CAROLINA LEGISLATORS YOUR REPRESENTATIVE & SENATOR

Ask: Review Project 205 spending. Oppose additional funding or financing approvals that would disturb the burial ground.

Find your state legislators:
scstatehouse.gov/legislatorssearch.php

Use your home address in the lookup.



4 SOUTH CAROLINA STATE HISTORIC PRESERVATION OFFICE

Ask: Support preservation in place through historic preservation review and recommendations.

803-896-6196 (department main line)
scdah.sc.gov/historic-preservation

5 SOUTH CAROLINA DEPARTMENT OF ENVIRONMENTAL SERVICES

Ask: Address burial-ground protection and permit compliance in Project 205 review.

sara.barbagallo@des.sc.gov
843-953-8819

6 TERRACON CULTURAL RESOURCE MANAGEMENT CONSULTANT

Ask: How was preservation in place evaluated? How do community objections affect recommendations? What safeguards apply before burial disturbance?

Charleston office: 843-884-1234
Ask for the Coming Street project team.
terracon.com/offices/charleston-sc/

YOUR MESSAGE CAN BE SIMPLE

Please preserve the burial ground at 106 Coming Street in place.
Leave those buried there undisturbed.

Use your own words. Include your name and community, request a written response, and keep a copy.