



September 30, 2016

Ashley Senn  
City of Columbus – Planning Division  
50 W. Gay Street  
Columbus, OH 43215-9040

Dear Ms. Senn:

I wanted to thank you again for the opportunity to discuss the upcoming development at the North Market site and share with you some of the concerns of the Ohio SHPO and the preservation community at-large.

First, I wanted to first provide you with some background information. As you know, the North Market is on the site of one of the very early public cemeteries in Columbus dating from about 1820 to about 1875. At the end of the 19<sup>th</sup> century, the North Cemetery was relocated when it was closed and development extended north along High Street. From 1875 to the present day, there have been a number of well-recorded findings of human remains when construction took place in the general area of the North Cemetery.

In 2000, sewer line construction was extended through this area as part of the CSO corrections and to accommodate the expansions of new buildings and commercial establishments (this was an undertaking pursuant to NHPA and reviewed by this office). Given the previous documentation of findings of human remains, SHPO recommended to OEPA that there should be directed efforts to identify and recover human remains. In turn, the OEPA had archaeological monitoring during construction in order to observe the excavated soil for evidence of burials. Excavated burials were found and the archaeological work intensified (there is a report on file at SHPO with additional details if needed). The accumulated human remains were reburied in Greenlawn Cemetery through the generosity of a private citizen.

Due to the results of previous work near the North Market, we at SHPO advise the City that it is prudent to be proactive because of the likelihood of identifying human remains during the proposed development that is envisioned.

Below are some suggestions in an outline for developing a broader scope of work:

1. Before construction and before final architecture and engineering plans are finalized:
  - a. In consultation with preservation professionals, construct GIS mapping with multiple layers that include early mapping, current conditions, and below ground utilities.
  - b. Compile a comprehensive list of names of people buried at the North Cemetery.
  - c. Conduct a geophysical survey using at least two instruments. This survey will provide information on locations of buried utilities and indicate interstitial gaps

or pockets where there could be better chances to identify and recover human remains.

2. At the start of construction:

- a. Remove concrete/asphalt surface from several judgmentally-placed, moderately small, rectangular units and conduct carefully controlled archaeological excavations to obtain data on the soils, disturbance, and seek to identify graves. Use these data to fine-tune research design;
- b. Integrate archaeological research design with construction plans. How much and how fast do the plans call for the removal of how much of the concrete/asphalt surface? Are the portions of the construction area that are not covered by a concrete/asphalt surface?
- c. Sampling: How many units will be excavated? How much can units be expanded?
- d. Establish plans for treatment and recovery of human remains. What are construction site procedures? When construction is stopped to assess identified features, how long of a delay will be allowed?
- e. Human remains will be collected by grave features along with any artifacts recovered in or adjacent to the feature. Features will be kept separate by provenience.
- f. A detailed plan for treatment of human remains and artifacts should be prepared by the consulting archaeologist to be reviewed and approved by the SHPO (see below, Principles).

3. During construction:

- a. Conduct systematic hand excavation of strategically and judgmentally placed excavation units in areas most likely to contain graves. Units to be excavated in controlled levels with screening of excavated soil.
- b. Monitoring: Archaeologists should monitor the mechanical excavation and removal of soil within the construction zone to a depth of at least 6 feet below the current surface to look for evidence of graves, and to identify human remains and recover diagnostic artifacts. The monitoring should be conducted according to a monitoring plan that has been completed in consultation with the SHPO.

4. After construction (earthwork):

- a. Conduct laboratory analysis following established, reviewed, and approved laboratory procedures. This includes analysis of human remains.
- b. Continue ongoing consultation on the disposition of human remains. Carry out resolution of this consultation.
- c. A final report should be prepared according to agreed upon standards and submitted for review and consultation by the SHPO.

5. Principles:

- a. Our current beliefs hold that our preferred course of action is to rebury human remains. We also believe that it is our responsibility to learn what we can about the deceased person before concluding analysis and reburial. Scientific analysis has the demonstrated potential for us to gain vitally important information necessary for informed interpretations concerning the deceased person. For this

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project and the burial population from the North Cemetery, this analysis should include standard measurements and high resolution photography.

- b. We do not currently support without reservation the reburial of co-mingled human remains; however, we do not universally prescribe placement in individual graves the remains apparently of each individual. We generally support that the graves should be clearly marked.
- c. At this time, the best scientific technique that we have to identify individuals from recovered human remains is through analysis of DNA. Based on the condition of the human remains, a reasonable effort will be made to recover and save in a secured laboratory setting samples that could provide DNA data. The presence of the collection containing these samples and the desired goal of DNA sequencing will be included in the final report.

We at the SHPO look forward to providing the City and future Developers any needed technical assistance in this matter. If you have any questions please contact me at [dwelling@ohiohistory.org](mailto:dwelling@ohiohistory.org) or 614-298-2015.

Regards,



Diana Welling  
Department Head & Deputy State Historic Preservation Officer for  
Resource Protection & Review