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o: 614-222-1330
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October 15, 2020

Ms. Tanowa M. Troupe
Ohio Power Siting Board
PUCO Docketing Division
180 East Broad Street, 11th Floor
Columbus, OH 43215-3716

Re: Case No. 16-253-GA-BTX
Staff Report Condition No. 11
Cemetery Monitoring Plan and Unanticipated Discovery Plan

Dear Ms. Troupe:

Please find attached the Cemetery Monitoring Plan and Unanticipated Discovery Plan as well as the concurrence notification from the State Historic Preservation Office (SHPO) for the Central Corridor Pipeline project.

Duke Energy Ohio sets forth this communication to certify our adherence with Condition No. 11 of the OPSB's Opinion, Order and Certificate pertaining to Case No. 16-253-GA-BTX.

Please contact me if you have any questions.

Sincerely,

Emily A. Olive, CP
Paralegal

From: Thomas Grooms <tgrooms@ohiohistory.org>
Sent: Monday, October 5, 2020 2:10 PM
To: Favret, Amy/CIN <Amy.Favret@jacobs.com>
Subject: [EXTERNAL] RE: Duke CCP Phase I Archaeology and Architectural and Historical resources reports

Yes you are correct. No further coordination is required until construction and monitoring activities begin.

**Thomas Grooms | Archaeology Transportation Reviews Manager,
State Historic Preservation Office**

Ohio History Connection | 800 E. 17th Ave., Columbus, OH 43211
p. 614.298.2017 | f. 614.298.2037 | tgrooms@ohiohistory.org

From: [Favret, Amy/CIN](#)
Sent: Monday, October 5, 2020 1:01 PM
To: [Thomas Grooms](#)
Subject: RE: Duke CCP Phase I Archaeology and Architectural and Historical resources reports

Hi Thomas,

I just wanted to make sure we're in agreement.

The cemetery monitoring plan submitted is sufficient, save for maps of the cemetery, which we are working to obtain from the Reading Cemetery Association, and will search for/obtain from local libraries and/or the Reading Historical Society. The maps and a more detailed history of the cemetery will be included in a monitoring report, completed at the conclusion of the field work.

We will notify when construction and monitoring for this begins, expected in 2021.

Is this all correct?

Thank you!

Amy

Amy C. Favret, M.A., RPA | Senior Archaeologist | O:+1.513.595.5642 | M:+1.513.257.3274 | amy.favret@jacobs.com

From: Thomas Grooms <tgrooms@ohiohistory.org>
Sent: Monday, October 5, 2020 9:34 AM
To: Favret, Amy/CIN <Amy.Favret@jacobs.com>
Subject: [EXTERNAL] RE: Duke CCP Phase I Archaeology and Architectural and Historical resources reports

No problem, I understand

**Thomas Grooms | Archaeology Transportation Reviews Manager,
State Historic Preservation Office**

Ohio History Connection | 800 E. 17th Ave., Columbus, OH 43211
p. 614.298.2017 | f. 614.298.2037 | tgrooms@ohiohistory.org

From: Favret, Amy/CIN
Sent: Monday, October 5, 2020 9:33 AM
To: Thomas Grooms
Subject: RE: Duke CCP Phase I Archaeology and Architectural and Historical resources reports

Thanks, Thomas,

I am working with Ms. Walker (Reading Cemetery Association) to get cemetery maps. She has extensive records, but hasn't pulled them all out yet for us to copy/scan. Hopefully she's got good names in those records! Unfortunately, with out libraries closed for in-person visits, the best we have so far are atlas-type maps that don't have much detail to them.

We will definitely keep you updated on when work starts.

Thanks!
Amy

Amy C. Favret, M.A., RPA | Senior Archaeologist | O:+1.513.595.5642 | M:+1.513.257.3274 | amy.favret@jacobs.com

From: Thomas Grooms <tgrooms@ohiohistory.org>

Sent: Monday, October 5, 2020 9:31 AM

To: Favret, Amy/CIN <Amy.Favret@jacobs.com>

Subject: [EXTERNAL] RE: Duke CCP Phase I Archaeology and Architectural and Historical resources reports

Amy

The monitoring plan is fine. I was hoping for some archival maps showing burial plots and family names so maybe you could anticipate where burials will be encountered and associate a name but I understand if you want to wait. Identifying next of kin is nearly impossible given the age but it is something that needs to be done or at least attempted. Typically just a notice in a local paper or cemetery newsletter is sufficient.

Send me an email when work begins.

Take care

Thomas

**Thomas Grooms | Archaeology Transportation Reviews Manager,
State Historic Preservation Office**

Ohio History Connection | 800 E. 17th Ave., Columbus, OH 43211
p. 614.298.2017 | f. 614.298.2037 | tgrooms@ohiohistory.org

From: [Favret, Amy/CIN](mailto:Amy.Favret@jacobs.com)

Sent: Friday, October 2, 2020 2:50 PM

To: [Thomas Grooms](mailto:tgrooms@ohiohistory.org); [Mary Rody](mailto:Mary.Rody@ohiohistory.org)

Subject: RE: Duke CCP Phase I Archaeology and Architectural and Historical resources reports

Hi Tom,

Please see the attached Monitoring Plan and Unanticipated Discovery Plan for the Duke CCP work near the Lockland-Reading/Reading Cemetery. I will be sending a hard copy on Monday.

Please feel free to reach out with questions or comments.

Thank you!

Amy

Amy C. Favret, M.A., RPA | Senior Archaeologist | O:+1.513.595.5642 | M:+1.513.257.3274 | amy.favret@jacobs.com



**C314V Central Corridor Pipeline Project
Cemetery Monitoring Plan and Unanticipated Discovery Plan**

Hamilton County, Ohio (OHPO #2016HAM36589)

October 2, 2020

Duke Energy Ohio, Inc.



Duke Energy, C314V Central Corridor Pipeline Project, Cemetery Monitoring Plan and
Unanticipated Discovery Plan, Hamilton County, Ohio (OHPO #2016HAM36589)

Project No: 672247CH
Document Title: Duke Energy, C314V Central Corridor Pipeline Project, Cemetery Monitoring Plan and
Unanticipated Discovery Plan (OHPO #2016HAM36589)
Date: October 2, 2020
Client Name: Duke Energy Ohio, Inc.
Project Manager: Mike Frank
Author: Amy C. Favret, M.A., RPA

Jacobs Engineering Group Inc.

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1. Introduction

On behalf of Duke Energy Ohio Inc. (Duke Energy), Jacobs Engineering Group, Inc. (Jacobs) conducted a Phase I archaeological reconnaissance for the proposed Central Corridor Pipeline Project in Hamilton County, Ohio. The proposed project consists of a 20.9-kilometer (13-mile) long, 20-inch diameter pipeline, planned to begin at a point near Duke Energy's existing WW Station (at the same location as the planned Highpoint Park Regulation Station) and extends generally southwest until it terminates at the planned Norwood Regulation Station, at the tie-in to the existing 20-inch diameter Line V.

For the Phase I cultural resources survey, the Area of Potential Effects (APE) was developed to consider potential Project impacts (both direct and indirect) to cultural resources. The direct APE is defined as the area proposed for ground disturbance, which includes the 20.9-kilometer (13-mile) long, 15-meter (50-foot) wide maximum width pipeline corridor. The trench width for pipe installation is typically 0.9 to 1.5 meters (3 to 5 feet) across and 1.8 meters (6 feet) deep. Workspace widths in areas of valve installations, requiring welds and bends, and at HDD entry and exit locations, may be wider. In these areas, the direct APE width was expanded (estimated not to exceed 84 meters [275 feet]) to accommodate valve installation, welding work, and HDD entry and exit pits, as well as potential future shifts or expansions of temporary workspaces within the currently planned workspace corridor width (e.g., to accommodate equipment access or to avoid existing utility infrastructure). Work within existing public road right-of-way (ROW) will be confined to the roadway and the land under the footprint of the pipe alignment.

A records search was performed in order to evaluate the impacts of the Project on previously identified cultural resources and to gauge the potential for previously unidentified resources that could be eligible for listing on the National Register of Historic Places (NRHP). Within 1.6 kilometers (one mile) of the Project, the literature review identified 16 Ohio Archaeological Inventory (OAI) sites, 441 Ohio Historic Inventory (OHI) resources, 10 Ohio Genealogical Society (OGS)-recorded cemeteries, four individual National Register of Historic Places (NRHP)-listed resources, and two NRHP-listed historic districts. In addition, six Phase I cultural resources surveys and two architectural and historical investigations have occurred within the Study Area radius. None of the previously inventoried cultural resources surveys was located within the limits of the APE.

Phase I archaeological reconnaissance and architectural and historical resources investigations were completed for the project in June and July 2020. The Phase I Archaeological Reconnaissance report was submitted to the Ohio Historic Preservation Office (OHPO) on August 3, 2020. The Phase I archaeological reconnaissance resulted in the identification of one archaeological site. Site 33HA885 consists of a historic artifact scatter, likely associated with the former Nevison-Weiskopf Glass Manufacturer. No intact subsurface cultural features or remnants of the former glass manufacturer were located during the Phase I and no further work was recommended.

On September 14, 2020, the OHPO concurred with the results and recommendations of the report, with the condition that a cemetery monitoring plan and unanticipated discoveries plan (UDP) be developed for work near the Lockland-Reading/Reading Protestant Cemetery. The Lockland-Reading/Reading Protestant Cemetery is within the Project's Indirect APE and adjacent to the Direct APE, on its western side, along West Street and West Pleasant Street in Reading.

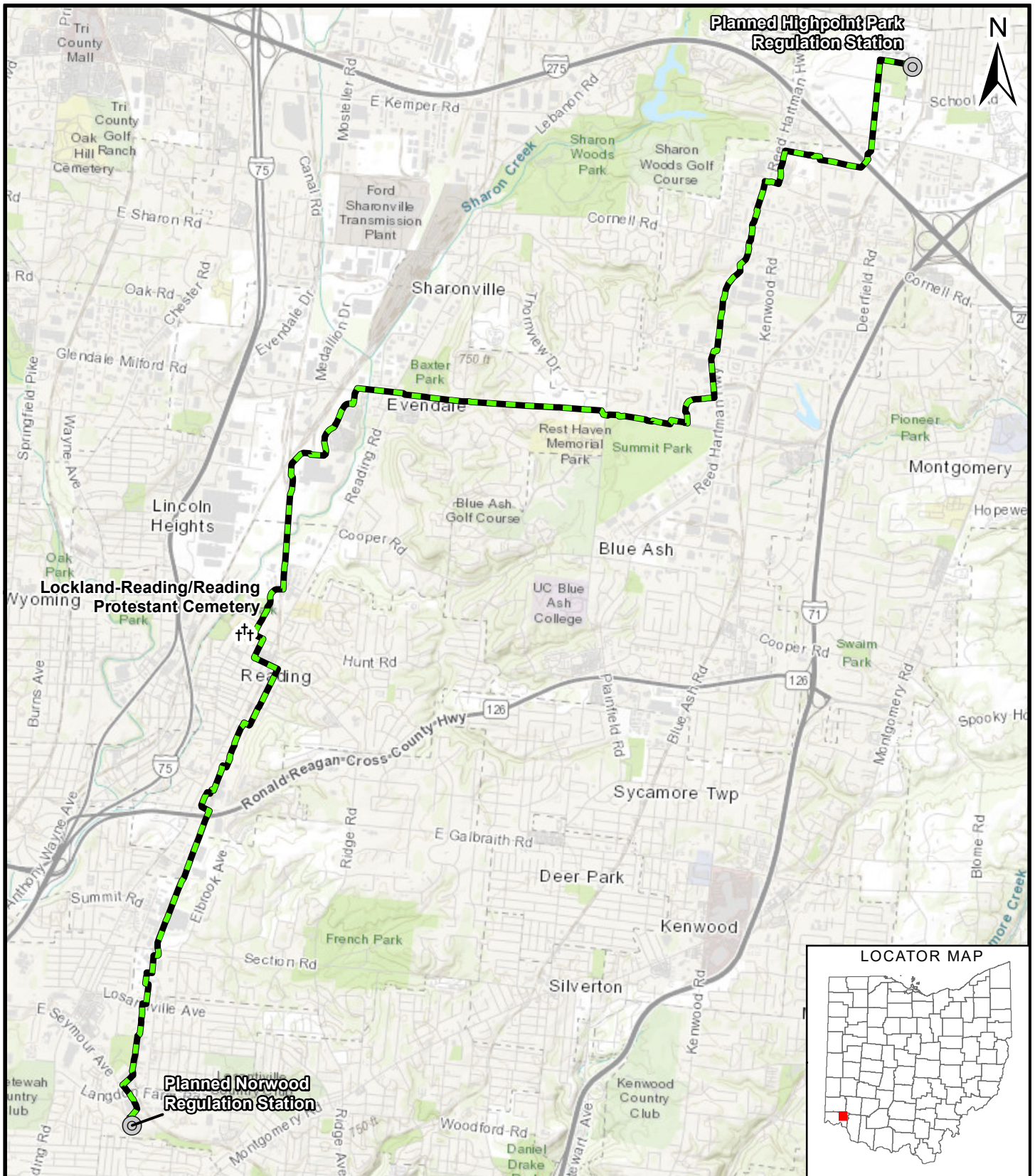
The Cemetery Monitoring Plan and UDP includes visual inspection of the APE, mapping, GPS recordation, and photo documentation during ground-disturbing activities, archaeological monitoring, and records including a daily log of observations made during the field work and construction activity. In addition, protocols for the handling of unanticipated discovery of human burials are presented. Per the OHPO, the cemetery avoidance/monitoring plan should include:

- 1) A commitment by Duke Energy to conduct archaeological monitoring and take all precautions to avoid disturbing human remains;
- 2) Delineation of the cemetery boundaries and burial locations established and/or potentially unknown as related to project plans;
- 3) A detailed discussion on disinterment, identification and notification of next of kin for unmarked burials;
- 4) A description of an appropriate location for reinterment of unmarked burials; and
- 5) Evidence that the entity in charge of the cemetery has been consulted and approves the plan (Grooms 2020).

This cemetery monitoring plan and UDP was prepared in accordance with guidance presented in the OHPO's September 14, 2020 letter and presents the field methodology for the archaeological monitoring as well as procedures in the event of an inadvertent discovery of human remains or graves within the Project's Area of Potential Effects (APE). In addition, this plan was reviewed and approved by Ms. Gayle Walker of the Reading Cemetery Association on October 1, 2020 (see Appendix A).

1.1 Lockland-Reading/Reading Protestant Cemetery

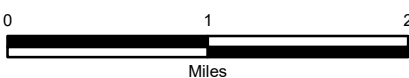
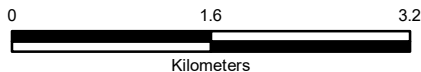
The Lockland-Reading/Reading Protestant Cemetery (OGS ID #4746; OHI #HAM0521350) (Reading Cemetery) is within the indirect APE and adjacent to the direct APE (Figure 1.2). According to the OGS record, the Reading Cemetery dates from 1827. The OHI form for the cemetery indicates that it is the oldest of four cemeteries in Reading. A portion of the cemetery in the current northeast section served as the churchyard for the Reading Presbyterian Church, which was founded in 1823 as the city's first religious group. The oldest portion of the cemetery is south of Pleasant Street, near West Street, adjacent to the Project APE. According to the OHI form, the burial markers in this portion of the cemetery date from the 1820s and 1830s. A full history of the cemetery will be included in the final monitoring report at the conclusion of field work.



LEGEND:

- †† Lockland-Reading/Reading Protestant Cemetery Location
- ⊙ Planned Regulation Stations
- Proposed Amended Route

BASE MAP SOURCE:
Esri World Topographic Layer



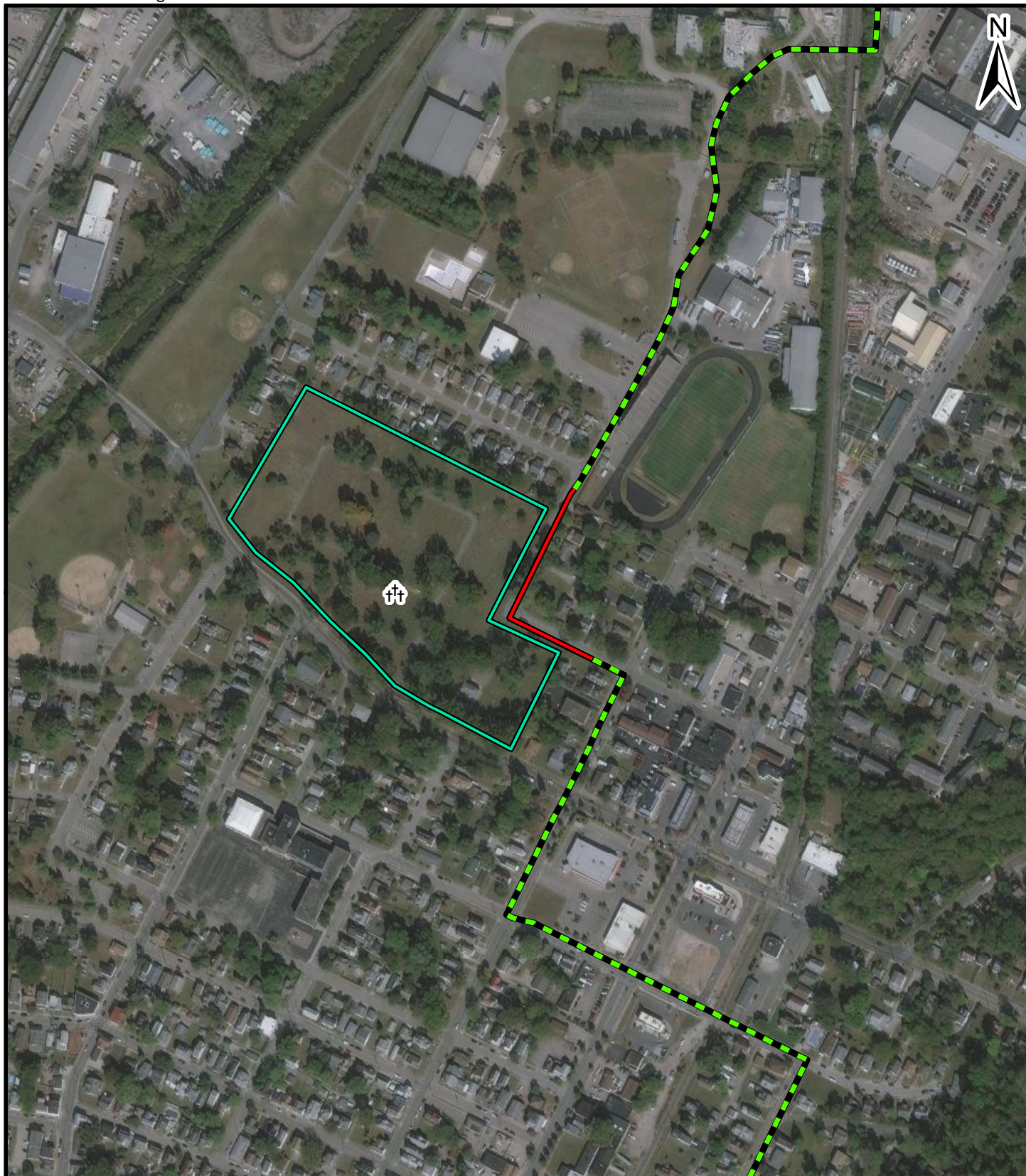
C314V Central Corridor
Pipeline Extension Project
Hamilton County, OH

**FIGURE 1
PROJECT LOCATION
MAP**





PN: 672247CH

DATE: 9/23/2020

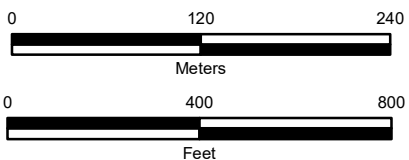




LEGEND:

-  Lockland-Reading/Reading Protestant Cemetery Location (OGS ID 4746)
-  Proposed Amended Route
-  Extent of Route to be Monitored during Construction
-  Cemetery Boundary

BASE MAP SOURCE:
Esri World Imagery Layer, 2019



C314V Central Corridor
Pipeline Extension Project
Hamilton County, OH

FIGURE 2
LOCKLAND-READING/READING
PROTESTANT CEMETERY
LOCATION MAP

PN: 672247CH

DATE: 9/24/2020



2. Archaeological Monitoring

A Secretary of the Interior (SOI)-qualified archaeologist will supervise and monitor all ground-disturbing activities within 30.5 meters (100 feet) of the Lockland-Reading/Reading Protestant Cemetery. Archaeological monitoring is required whenever ground disturbance is planned, including during any excavation activities involving removal of asphalt, removal of fill, or any other activity that results in physical ground disturbance.

Monitoring activities include the following methodology:

- Visual inspection of the APE within 30.5 meters (100 feet) of the cemetery.
- Mapping, GPS recordation, and photo documentation of the APE within 30.5 meters (100 feet) of the cemetery, and during ground-disturbing activities.
- Archaeological monitoring of all manual and mechanical excavations will be conducted during ground disturbance. When artifacts are encountered, archaeologists will halt excavations and record the cultural deposits through photographs, profile mapping, and plan view mapping, and will record the locations of artifacts with a GPS unit capable of sub-meter accuracy.
- Archaeological staff will maintain systematic records including a daily monitoring log. The daily log will record the observations made during monitoring activities.

2.1 Unanticipated Discovery Plan

In the event of a discovery of human remains, associated artifacts, grave shafts, etc., Duke will follow all relevant Ohio state laws and recommendations regarding treatment of human remains.

The following measures will be implemented should an unanticipated discovery of human remains or associated artifacts be made during archaeological monitoring and/or construction:

1. Construction within the (50 feet) of the unanticipated discovery will be immediately halted and the location will be secured and protected from damage and disturbance. The area will be marked with flagging, tape, or construction fencing.
2. The Reading Cemetery Association, the City of Reading Police, and the Hamilton County Coroner will be notified by Duke Energy or an appropriate representative. In addition, the OHPO will be notified.
3. Once all notifications under #2 have been completed (by phone or in-person conversation), any human remains, or burial cases will be photographed and carefully removed from the excavation area. Burial cases will be reinterred at a suitable location within the cemetery, in coordination with any known next of kin and/or the Reading Cemetery Association. Human remains not within a burial case will be removed, containerized and transported to the Hamilton County Coroner's Office for identification and analysis.
4. Following identification and analysis of human remains, next of kin will be notified and the disposition of the remains will be determined. Remains whose origins are not identified will be reinterred at a suitable location determined in coordination with the Reading Cemetery Association.

2.2 Contact List

Reading Cemetery (Lockland-Reading; Reading Protestant Cemetery)
Gayle Walker (Site Manager)
Reading Cemetery Association

200 W Columbia Avenue
Cincinnati, OH 45215
Phone: 513-554-1027
Mobile Phone: 513-227-5378

City of Reading Police

Bryan Edens, Chief
1000 Market Street
Cincinnati, Ohio 45215
Phone: 513-733-4122

Hamilton County Coroner

Dr. Lakshmi Kode Sammarco
3159 Eden Avenue
Cincinnati, Ohio 45219
Phone: 513-946-8700

OHPO

Thomas Grooms
Archaeology Transportation Reviews Manager
800 E. 17th Avenue
Columbus, Ohio 43211
Phone: 614-298-2017

Duke Energy Ohio, Inc.

James Olderberg
Senior Project Manager
139 E 4th Street, Room 420
Cincinnati, Ohio 45202
Phone: 513-287-3021
Mobile Phone: 513-544-9692

Jacobs Engineering Group, Inc.

Amy Favret, M.A., RPA
Principal Investigator
2 Crown Pointe Court
Cincinnati, Ohio 45241
Mobile Phone: 513-257-3274

Mike Frank
Project Manager
2 Crown Pointe Court
Cincinnati, Ohio 45241
Mobile Phone: 513-900-7738

3. Report

Following the conclusion of ground disturbing activities near the Reading Cemetery, Jacobs will produce an Archaeological Monitoring report for review by the USACE and OHPO. The report will include an introduction, background data, field methodology, and results of the archaeological monitoring. If human remains are discovered during the construction activities, a description of the discovery, methodology for removal, skeletal analysis, and reburial, including full description of artifacts, skeletal remains, attempts at identification, and plan-view mapping of each burial will be included in the Monitoring Report.

4. References

Favret, Amy C. and Jared N. Tuk

2020 *Cultural Resources Work Plan, C314-V Central Corridor Pipeline Project*. Jacobs Engineering Group, Inc.
Prepared for Duke Energy Ohio, Inc.

Favret, Amy C., Derrick Cole, and Kyle Mayer

2020 *Phase I Archaeological Reconnaissance, Duke Energy Central Corridor Pipeline Project, Hamilton County, Ohio*. Jacobs Engineering Group, Inc. Prepared for Duke Energy Ohio, Inc.

Ohio Historic Preservation Office

1994 *Archaeological Guidelines*. Ohio Historical Society, Columbus.

Appendix A. Reading Cemetery Association Agreement

Date: 10/11/2020

Amy C. Favret, M.A. RPA
Jacobs Engineering Group, Inc.
2 Crowne Point, Suite 100
Cincinnati Ohio 45202

**Re: Concurrence with the Cemetery Monitoring Plan and Unanticipated Discoveries Plan -
Duke Energy Central Corridor Gas Pipeline Project**

Dear Ms. Favret:

I understand that Duke Energy Ohio, Inc., (Duke Energy) is planning to construct a natural gas pipeline including a portion within the pavement of West Street and W. Pleasant Street which adjoins the Lockland-Reading/Reading Protestant Cemetery property as described in your letter of September 29, 2020.

As the Site Manager of the cemetery, I hereby grant approval of the Cemetery Monitoring Plan and unanticipated discoveries plan.



Signature

Gail Walker Gayle Walker
Name (Printed)

Site Manager, Lockland-Reading/Reading Protestant Cemetery
Title