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February 27, 2023

Kaitlin Bryan
Historic Preservation Officer
City of Covington, KY
20 West Pike Street, 2nd floor
Covington, KY 41011
Via email: Kaitlin.Bryan@covingtonky.gov

Re: IRS 23 Acre Redevelopment Study Area, Covington
Kenton County

Dear Ms. Bryan,

Thank you for your recent submission of documents related to the above-referenced undertaking. We understand the City of Covington proposes redevelopment of 23 acres of land located at 246 W. Rivercenter Blvd., Covington, in Kenton County. We understand that project activities began in 2022, but have recently been halted. K&V Cultural Resources Management, LLC (K&V) completed a Cultural Resources Site File Review and an Archaeological Testing Plan for the project.

We note that emergency documentation regarding this undertaking was completed and a technical report was drafted by Terracon Consultants, Inc. (Terracon) in October of 2022. This report was not submitted to our office, and we have not provided comments on it. We accept the use of this report as a source of minor information (as it was presented within K&V's Site File Review and an Archaeological Testing Plan), however the Terracon documentation should not be considered official.

At this time we are unable to accept the Archaeological Testing Plan as-is. Due to duplication of information in each document, combined comments are presented below. We request both a revised Cultural Resources Site File Review and a revised Archaeological Testing Plan that address the following:

- The documents should discuss the project activities that have already been completed, and directly address any possible adverse effects from the undertaking that have already occurred. Please present options to mitigate these effects.
- The Public Component should be more detailed, and should propose concrete, substantive plans.



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- Is it possible to determine the depth of disturbance from the IRS building? We note that K&V propose to not excavate within the former IRS Building footprint due to disturbance from that construction, and did not include in their research outbuildings from historic documents for this portion of the project area. However, no depth of disturbance was provided, so it is unclear to what extent any potential features would have been impacted by the building. According to K&V's documents, Terracon's emergency documentation of the area identified a foundation within the footprint of the former IRS Building. While the Terracon report has not been reviewed by our office, if an intact feature was discovered there, it would seem to indicate it's possible for others to be present.
- There is a group of mapped outbuildings to the center-east of the old IRS footprint. According to the submitted materials the associated structures were demolished in the 1960s and the area was paved over with a parking lot. Since the parking lot likely caused fairly minor disturbance, why weren't these outbuildings considered for excavation?
- Similarly, two separate groups of outbuildings in the upper northwestern edge of the project area, just outside of the IRS footprint, are not proposed for excavation due to 1960s demolition and a sewerline built in the vicinity. However, the sewerline is mapped fairly far away from many of these outbuildings. Please expound on any known disturbances in this area.

Additionally, the following should be addressed in the revised documents:

- Please ensure all maps and photographs contain dates. Please provide recent photographs of the project area.
- In the Site File Review document, please provide a key in Figure 6 to make clear what the various colors mean.

We look forward to continued consultation regarding this undertaking. We also request the submission of the above-referenced Terracon technical report for our review. Please also note that if adverse effects have occurred beyond the assumptions made in these documents (i.e., that cultural features still exist on the property in a useful form despite the completed project activities), additional mitigation measures may be required. Should project plans change, or if you have any questions, please do not hesitate to contact Patti Hutchins of my staff via email at patricia.hutchins@ky.gov.

Sincerely,



Craig A. Potts,
Executive Director and
State Historic Preservation Officer

KHC # 230312
CP/peh



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