

Phase III Archaeology Investigations at the Covington Central Riverfront

TO: City Manager, Mayor & City Commissioners.

2/9/2024

FROM: Kaitlin Bryan, Historic Preservation Officer

CC: Elizabeth Wetzels, Special Projects Director

The following laws apply to the proposed redevelopment of the 23-Acre, former IRS Site. (Covington Central Riverfront)

National Historic Preservation Act (NHPA) of 1966: Legislation which extends the protection of the federal government to historic resources at the state and local levels. It includes not only national historic landmarks, but also sites, objects, buildings, and districts that are significant in American history, architecture, archaeology, and culture. All construction on federal lands or that uses federal funds requires an archaeological survey to find out if sites will be damaged by the construction, and how the sites can be recorded before that happens.

Kentucky Antiquities Act: Public policy to preserve archaeological sites and objects of antiquity and to limit archaeological work (exploration, excavation, and collection) to qualified persons and institutions. It prohibits the willful damage or destruction of archaeological sites on lands owned or leased by the state, state agencies, counties, or municipalities, and requires a permit from the University of Kentucky's Department of Anthropology to explore or excavate archaeological sites on these lands. It requires anyone who discovers a site to report it to the Department. It is a felony to violate the sections of the Kentucky Antiquities Act prohibiting the willful destruction of archaeological sites and requiring permits to excavate. (KRS 164.705 - KRS 164.735; KRS 164.990)

The following archaeological investigations have or will take place to comply with the above laws, as approved by KHC.

Phase I: Cultural Resources Site File Review and Proposed Archaeological Testing Plan, by K&V Cultural Resource Management. Completed on March 17, 2023, submitted on May 5, 2023, revised on June 5, 2023, and approved by the Kentucky Heritage Council on July 10, 2023. (Cost: **\$7,138.00**)

*The October 4, 2022, Terracon Archaeological Assessment Report was included in the submission.

Phase II: Preliminary Archaeological Investigations Field Work and Management Summary, by K&V Cultural Resource Management. Completed on September 15, 2023, submitted on October 16, 2023, and approved by the Kentucky Heritage Council on November 9, 2023. (Cost: **\$83,388.00**)

*The 1964 and 2020 Geotechnical Data from Terracon was included in the submission.

Phase III: Archaeological Mitigation and Data Recovery Services at sites 15KE205, 15KE207 & 15KE208. K&V Cultural Resource Management submitted the only responsive RFP bid on January 17, 2024. (Cost: **\$282,475.00**)

Phase IV: Execute a Programmatic Agreement between the City of Covington and the Kentucky Heritage Council. A consulting party has been formed. The "below ground" mitigation will be satisfied by Phase III field work and written report. The City, with the consulting party, will develop and conduct "above ground" mitigation which will include a public component.

*At this time, the City of Covington Commission is requested to approve the execution of a contract with K&V to complete Phase III archaeology. All phases are being funded by the IRS site Bond Fund.

The overall Project Area was divided into three sections for the purposes of the archaeological investigations: the Daycare Lot, the Main IRS Block, and the West Parking Lot.

The Daycare Lot is a 2.7-acre section on the east side of the Project Area. It is not slated for development for at least two years, per Covington. No archaeological testing took place at this time in the Daycare Lot. If the Daycare Lot comes up for development in the future, limited archaeological testing is recommended.

The Main IRS Block houses the main IRS building and encompasses approximately 17.6 acres. The subsurface had been heavily impacted by construction in the 1960s and demolition/removal of subsurface infrastructure in 2022. Archaeological testing took place in the northwest corner of the Main IRS Block but found no significant archaeological features. The work resulted in the documentation of one archaeological site, **15KE204**, and is not eligible for the National Register of Historic Places. The KYOSA had requested field investigation associated with two concrete features documented in October 2022, phase II indicated that **F1** and **F2** are associated with modern additions to the IRS building. No further archaeological investigation is recommended for the Main IRS Block

The West Parking Lot is located west of Johnson Street, north of 4th Street and encompasses a city block. Archaeological testing following platted lot lines and individual addresses. Archaeological testing documented four archaeological sites 15KE205 through 15KE208. **15KE205**: Privies documented in Lot 3 and the south half of Lot 2 are recommended as contributing archaeological resources. The remainder of the site is recommended as non-contributing. The site is recommended as eligible for the National Register. **15KE206**: The site is recommended as not eligible for the National Register. No further archaeological investigation is recommended. **15KE207**: Privies documented in the north 1/4th of Lot 12 and the south 1/2 of Lot 13 are recommended as contributing archaeological resources. The remainder of the site is recommended as non-contributing. The site is recommended as eligible for the National Register. **15KE208**: Privies documented in Lot 8 and the east 1/2 of Lot 9 are recommended as contributing resources within the overall site. Lots 5, 6, west 1/2 of 9 and Lot 10 are recommended as non-contributing resources. The site is recommended as eligible for the National Register.

*Phase III archaeological mitigation is recommended only for the contributing resources/features within a site.

