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MEMORANDUM

To: Consultants on Projects Involving Both Cultural Historic and Archaeological Sites

From: Craig Potts, Executive Director and State Historic Preservation Officer, KHC

Date: July 1, 2016

Due to differences in reporting and archival needs, cultural historic sites (above-ground buildings, structures, and objects) need to be reported separately from archaeological sites. Whenever a project subject to Section 106 review requires the identification and evaluation of both cultural historic and archaeological sites in order to assess potential effects, separate cultural historic and archaeological reports shall be prepared.

Cultural historic reports may take two forms:

A letter report is an abbreviated, bound report that includes, at minimum, the following:

- 1) A brief description of the project and area of potential effects (APE)
- 2) A discussion of the results of the records review
- 3) Descriptions, National Register of Historic Places (NRHP) evaluations, and assessments of effects (if applicable) for identified cultural historic sites
- 4) Appropriate mapping identifying the locations of the project, APE, and identified sites
- 5) Photographs depicting identified sites

Please consult with the Kentucky Heritage Council in advance if you feel that the completion of Kentucky Historic Resources Inventory (survey) forms may not be necessary for any or all resources in the letter report.

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A full cultural historic report follows the KHC *Specifications for Conducting Fieldwork and Preparing Cultural Resource Assessment Report*. Key factors distinguishing it from a letter report include a more in depth discussion of survey methodology, the environmental setting of the project, and historic context(s) for evaluating recorded properties.

A letter report format generally is acceptable if there are 4 or fewer cultural historic sites recorded for a given project. However, to avoid requests for additional information from the KHC reviewer, a full cultural historic report is required in the following circumstances, regardless of number of resources recorded:

1. Given the nature of the project and the types of cultural historic resources known to exist in the project area, there is strong potential for adverse effects to historic properties
2. The survey records previously undocumented sites that retain integrity and are of a potentially significant nature to require original historic context development in order to properly evaluate them

All cultural historic reports, regardless of format, shall be prepared by a professional who meets the Secretary of the Interior's Professional Qualification Standards for Architectural History or History. Information from these reports should be included in archaeological reports when understanding the type of location of above-ground resources informs the interpretation of the site. This would include times when above-ground structures imply the presence of archaeological resources, aid in the interpretation of a historic site, or support evidence of disturbance.