

July 9, 2026

Ms. Savannah Darr
Historic Preservation Officer
Urban Design Team Member
Office of Planning
Louisville Metro Government
444 South Fifth Street, Suite 300
Louisville, Kentucky 40202
Savannah.Darr@louisvilleky.gov

Re: Summary Document for the Verification of the Southern Boundary of the Manslick Cemetery at the Adalynn Crossing Development Project (Project) in Louisville, Jefferson County, Kentucky. FY265-13928.

Dear Ms. Darr:

Environment & Archaeology (Contractor), under contract to IWM Consulting Group, LLC (Client) on behalf of Adalynn Crossing, Limited Partnership (ACLP), conducted a Cultural Resources Investigation for the proposed Project, located in the town of Louisville, Jefferson County, Kentucky (Attachment I: Figure 1 and Figure 2). The Project appears on the 2000 7.5' USGS Louisville, Kentucky quadrangle (Attachment I: Figure 2). The proposed Project, located at 3705 Manslick Road, Louisville, Kentucky, 40202, will consist of two 3-story apartment buildings, containing 48 general occupancy apartments, a single-story community structure/community area, parking, walkways, outdoor amenities, site utilities, stormwater features, and associated site improvements. These components will be constructed within a 1.579-acre limits of disturbance (LOD). The LOD is in an urban area of Louisville, Jefferson County, located adjacent to the Henry Watterson Expressway (I-264), Manslick Road to the west, Watterson Park to the east, and the Manslick Cemetery to the north (Attachment I: Figure 3). The Office of Housing and Urban Development (HUD) is the lead federal agency associated with the Project. Per discussions with the Client, these investigations focused on determining if the Manslick Cemetery extended into the LOD and if any visual evidence of burials was present in the LOD. A separate Section 106 consultation has been initiated with Kentucky Heritage Council (KHC) State Historic Preservation Office (SHPO). This document only addresses Louisville Metro's concerns regarding the cemetery boundary.

On June 29, 2026, *Environment & Archaeology* Principal Investigator Luke W. Erickson, M.A., submitted a project registration/records check to the Kentucky Office of State Archaeology (OSA) (FY26-13928). The results of the OSA records check did not identify any previously recorded archaeological sites or surveys within the LOD. Mr. Erickson also performed a records check of the online GIS site file database of the SHPO on June 30, 2026. The results of the KHC records check identified the Preliminary Data/Preliminary Resource Area boundary of the Manslick Cemetery/JFSS 130 encompassing the LOD (Attachment I: Figure 4). The KHC Survey Form for the Manslick Cemetery was partially filled out on January 8, 2008, as part of the Motorola Watterson Park Tower Site Survey (SHPO ID 056-308). This survey (056-308), conducted in October 2007, is located outside and to the east of the LOD (Attachment I: Figure 4). No mention of the Manslick Cemetery was found in the report for 056-308. It is possible that the completion of the survey form for the Manslick Cemetery was post survey and no final survey form was completed. The KHC SHPOs National Register of Historic Places (NRHP) evaluation for the Manslick Cemetery is listed as Ineligible.

Manslick Cemetery Background Research Results

The Manslick Cemetery, also known as the Alms House Cemetery and the 7th Street Cemetery, was associated with the County Infirmary/City of Louisville Alms House/Home for the Aged (Facility). The Facility was opened in 1874, operated until it was closed in 1953, razed soon after closing, and any remnants of the Facility are now located under the Southland Terrace Shopping Center. The Manslick Cemetery was deemed full in 1987 and closed to any further burials. It is possible that over 1,000 individuals are buried in Manslick Cemetery, though very few burial markers are visible on the surface of the cemetery.

Historic Quadrangles

The Facility and the initial/original location of the Manslick cemetery are mapped on the 1909, 1912, 1935, 1938, and 1942 15' Kosmosdale, Kentucky USGS Topographic quadrangles. There is no difference between these quadrangles regarding the location of the Facility and the initial/original location for the Manslick Cemetery (Attachment I: Figure 5). These quadrangles have the route of Mill Creek mapped within the northern portion of the LOD.

The 1913 Louisville Title Company Page contains a boundary for the Facility property, but no mapped building or cemetery (Attachment I: Figure 6). This figure also has the route of Mill Creek mapped within the northern portion of the LOD.

The 7.5' 1957 Louisville West and the 15' 1959 Kosmosdale, Kentucky quadrangles have the Facility building mapped but no mapped cemetery (Attachment I: Figure 7 and Figure 8). Figure 8 has the Facility labeled as Home for the Aged. These quadrangles also have the route of Mill Creek mapped within the northern part of the LOD. Additionally, these show a rail line within the northern portion of the current LOD, north of Mill Creek.

Sometime between 1957 and 1961, the original route of Manslick Road is changed so it is straight instead of curved. This reroute moved Manslick Road to the west of the Project and also created the western boundary for the Manslick Cemetery. The original route of Manslick Road is now Old Manslick Road and is the eastern boundary for Manslick Cemetery.

The 1961, 1966, and 1984 7.5' Louisville West, Kentucky quadrangles no longer have the Facility building mapped, but they have the current location of the Manslick Cemetery identified. Additionally, a Manslick Cemetery property boundary line (black dashed line) is mapped above the northern boundary of the LOD on these three quadrangles (Attachment I: Figure 9 through Figure 11). On Figure 9 and Figure 10, the rail line is no longer mapped within the LOD, but Mill Creek is still mapped in its original location. Figure 11 has a building icon mapped within the LOD and Mill Creek has been relocated to the southern extent of the LOD, running parallel to I-264.

The mapped building icons within the LOD are updated between the 1984 and the current 2000 7.7' Louisville West, Kentucky quadrangle (Attachment I: Figure 12). There are no changes to the Manslick Cemetery between these two quadrangles.

Aerial Imagery

The current land use of the Manslick Cemetery has remained unchanged since its creation. It has been an open field setting with manicured grass and few trees. Based on imagery available on Google Earth Pro, the land use of the LOD has been continuously changed, beginning in the 1980s and ending in 2025. By using the Google Earth Timeline feature it was determined that from 1980 until now, the entire LOD has

been disturbed by construction activities related to the building and demolishing of buildings, concrete foundations, asphalt roadways and parking areas.

Property Boundaries

Shapefiles available from the Louisville Metro Open Data website, [Louisville Kentucky Open Data](#), provide exact property boundaries for the Manslick Cemetery (Attachment I: Figure 13). Files available from the Jefferson County Kentucky PVA website, [Jefferson County PVA](#), also provide exact property boundaries for the Manslick cemetery (Attachment I: Figure 14). The property boundaries for the Manslick Cemetery from Figure 13 and Figure 14, match the mapped southern property boundary line found on Figure 9 through Figure 13 (Attachment I: Figure 15).

Site Visit

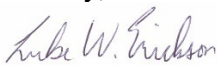
The LOD was visited by *Environment & Archaeology* Senior Archaeology Field Director Robert Whitlatch and Field Technician Douglas Whitlatch. The LOD was walked over with any grass areas searched for depressions or markers that might indicate a burial is present. No such depressions were identified. The LOD is enclosed by a chain-linked fence, and the ground surface is covered with concrete areas, asphalt areas, graveled areas, and grassed areas that had been previously disturbed (Attachment II).

Assessment and Recommendation

Based on the information provided in the document and the site visit, it is the opinion of *Environment & Archaeology* that the Manslick Cemetery is not present within the Project LOD. All available evidence indicated that the Manslick Cemetery, and its boundary, did not exist south past the historic rail line spur or the original route of Mill Creek, both of which were historically within the northern portion of the Project LOD. It is the opinion of *Environment & Archaeology* that the Project should be allowed to proceed, as originally proposed. It is recommended that an Unanticipated Discovery Plan should be in place before construction activities begin.

If you should have any questions, please feel free to contact me at lerickson@enviro-arch.com or (859) 496-7789.

Sincerely,



Luke W. Erickson, M.A.
Principal Investigator

Attachment I: Project Figures
Attachment II: Photolog

ATTACHMENT I
Project Figures

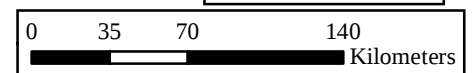
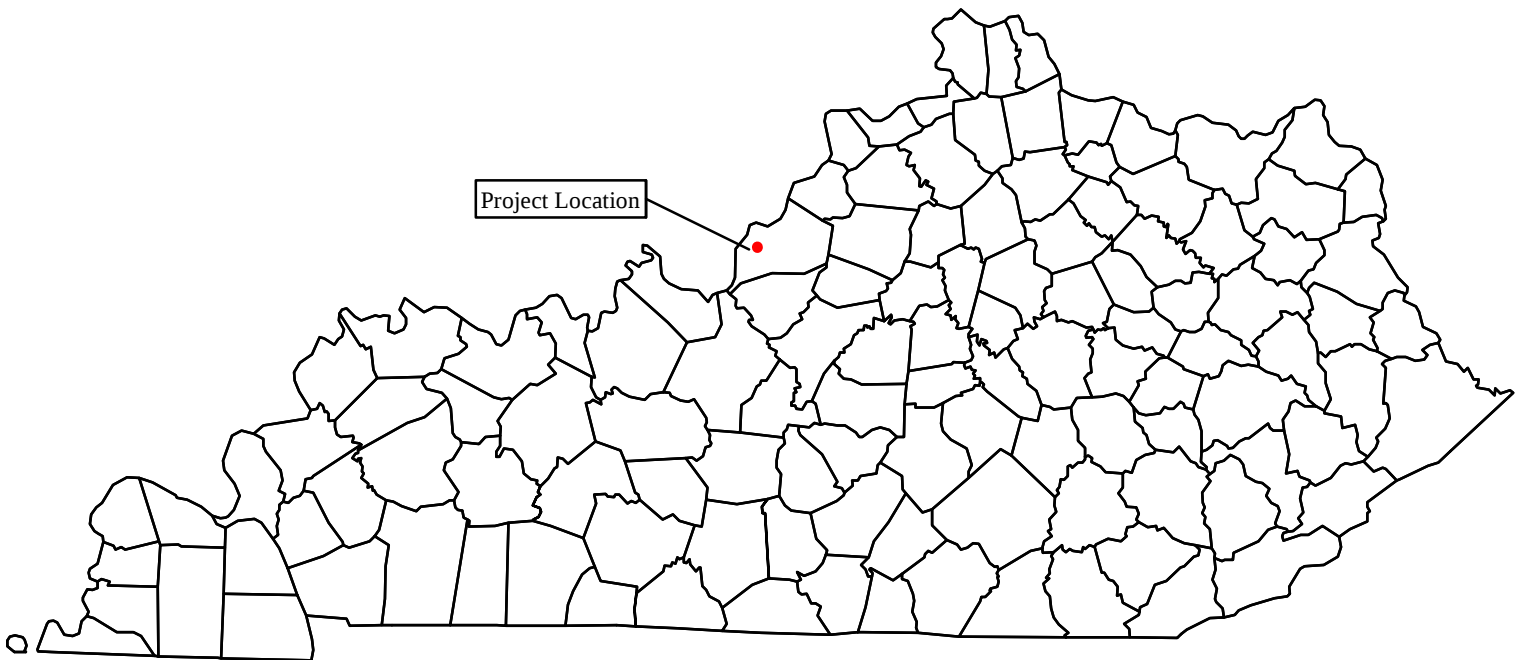
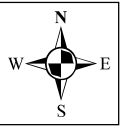


Figure 1

IWM Consulting Group, LLC
Adalynn Crossing Development Project
Louisville, Jefferson County, Kentucky

Received July 9, 2026

State Map with
Project Location

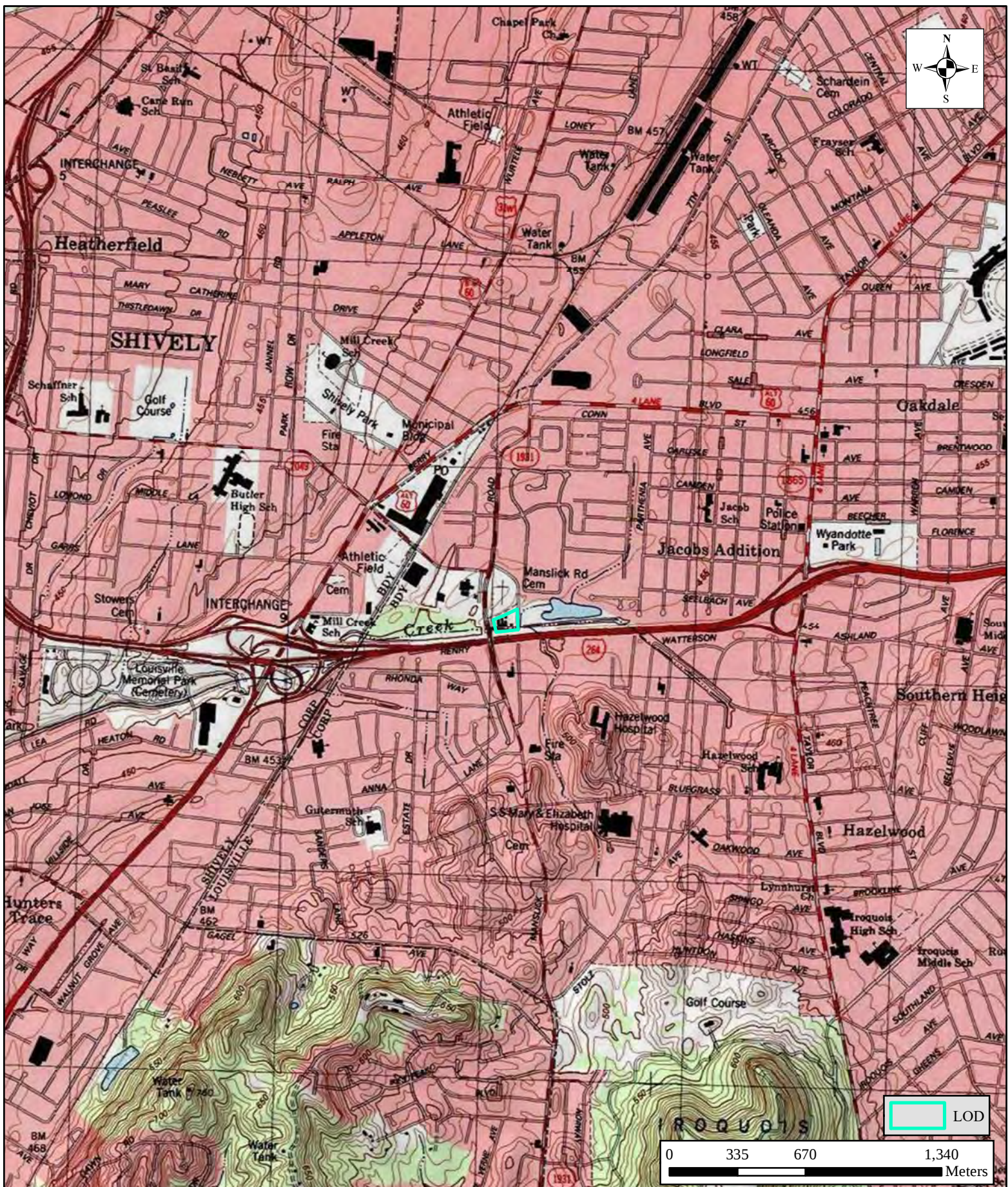


Figure 2

IWM Consulting Group, LLC
 Adalynn Crossing Development Project
 Louisville, Jefferson County, Kentucky

Received July 9, 2026

7.5' USGS Topographic Map
 2000 Louisville, Kentucky Quadrangle

Environment
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 Archaeology

26-CAT3-0002

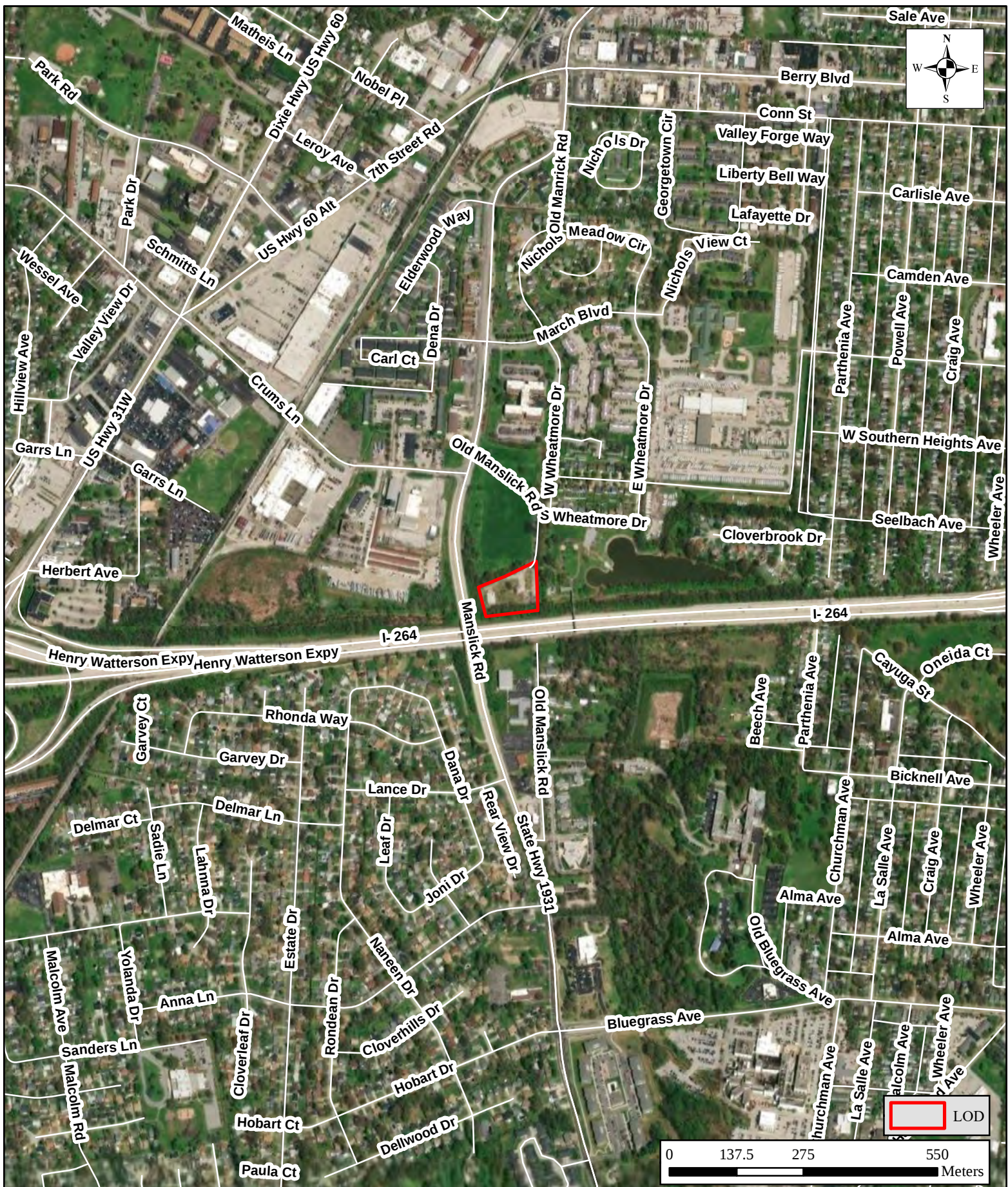


Figure 3

IWM Consulting Group, LLC
Adalynn Crossing Development Project
Louisville, Jefferson County, Kentucky

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Aerial with APE
Aerial Provided by ArcGIS Online

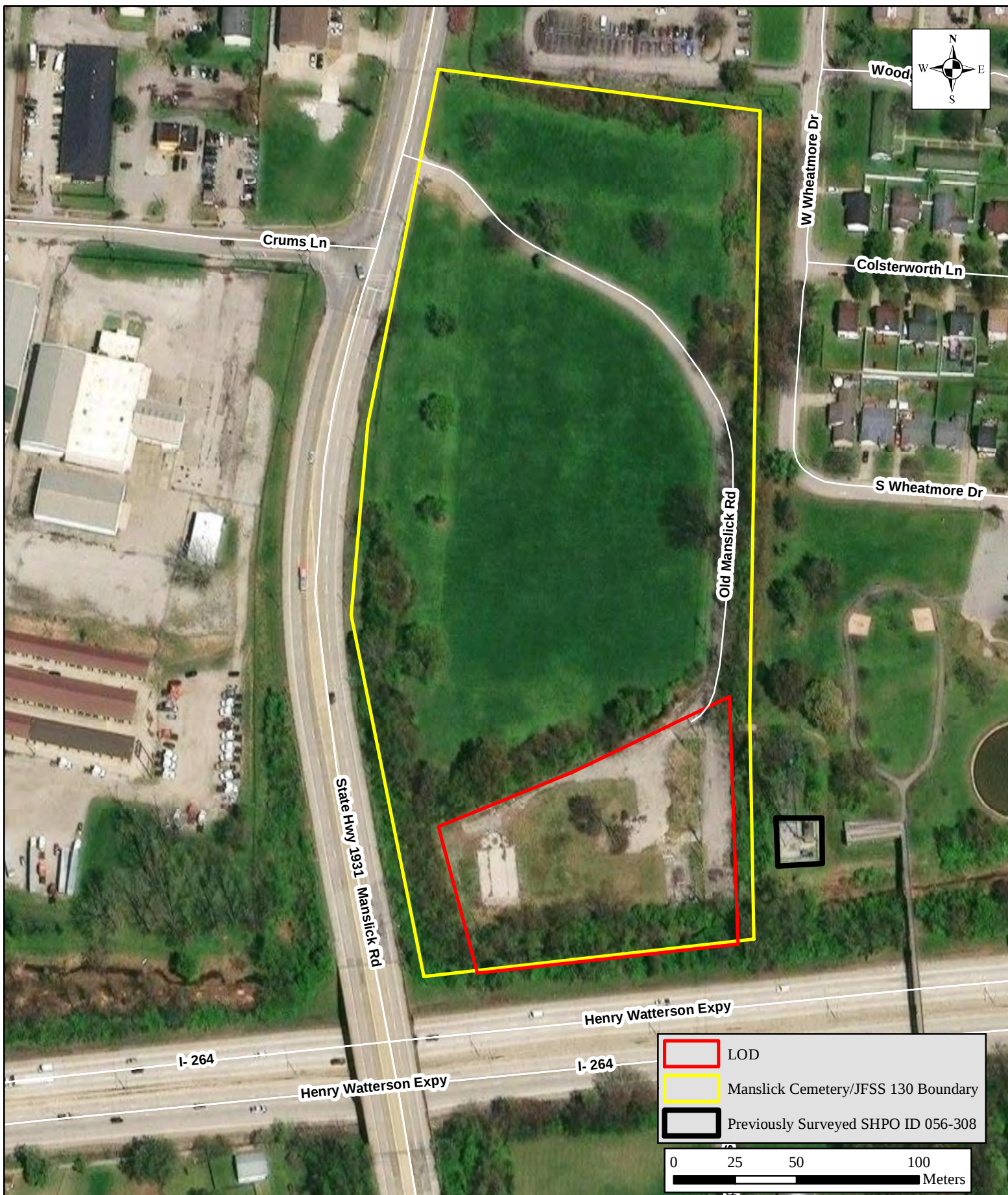


Figure 4

IWM Consulting Group, LLC
Adalynn Crossing Development Project
Louisville, Jefferson County, Kentucky

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Aerial with APE and
Manslick Cemetery Boundary
Aerial Provided by ArcGIS Online

Environment
&
Archaeology

26-CAT3-0002



Figure 5

IWM Consulting Group, LLC
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15' USGS Topographic Map
 1909 Kosmodale, Kentucky Quadrangle

Environment
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 Archaeology
 26-CAT3-0002

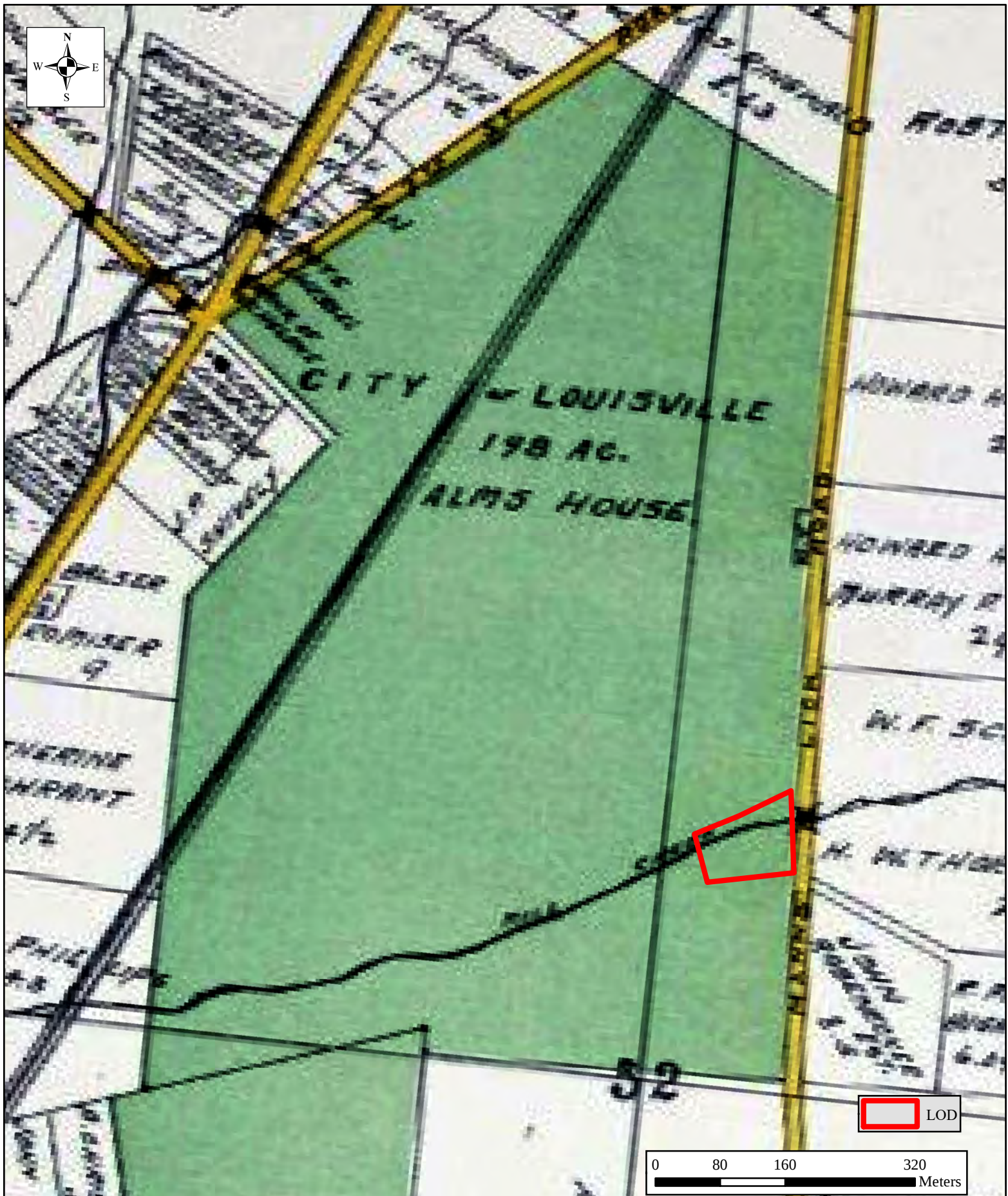


Figure 6

IWM Consulting Group, LLC
 Adalynn Crossing Development Project
 Louisville, Jefferson County, Kentucky

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1913 Louisville Title
 Company Page

Environment
 &
 Archaeology

26-CAT3-0002

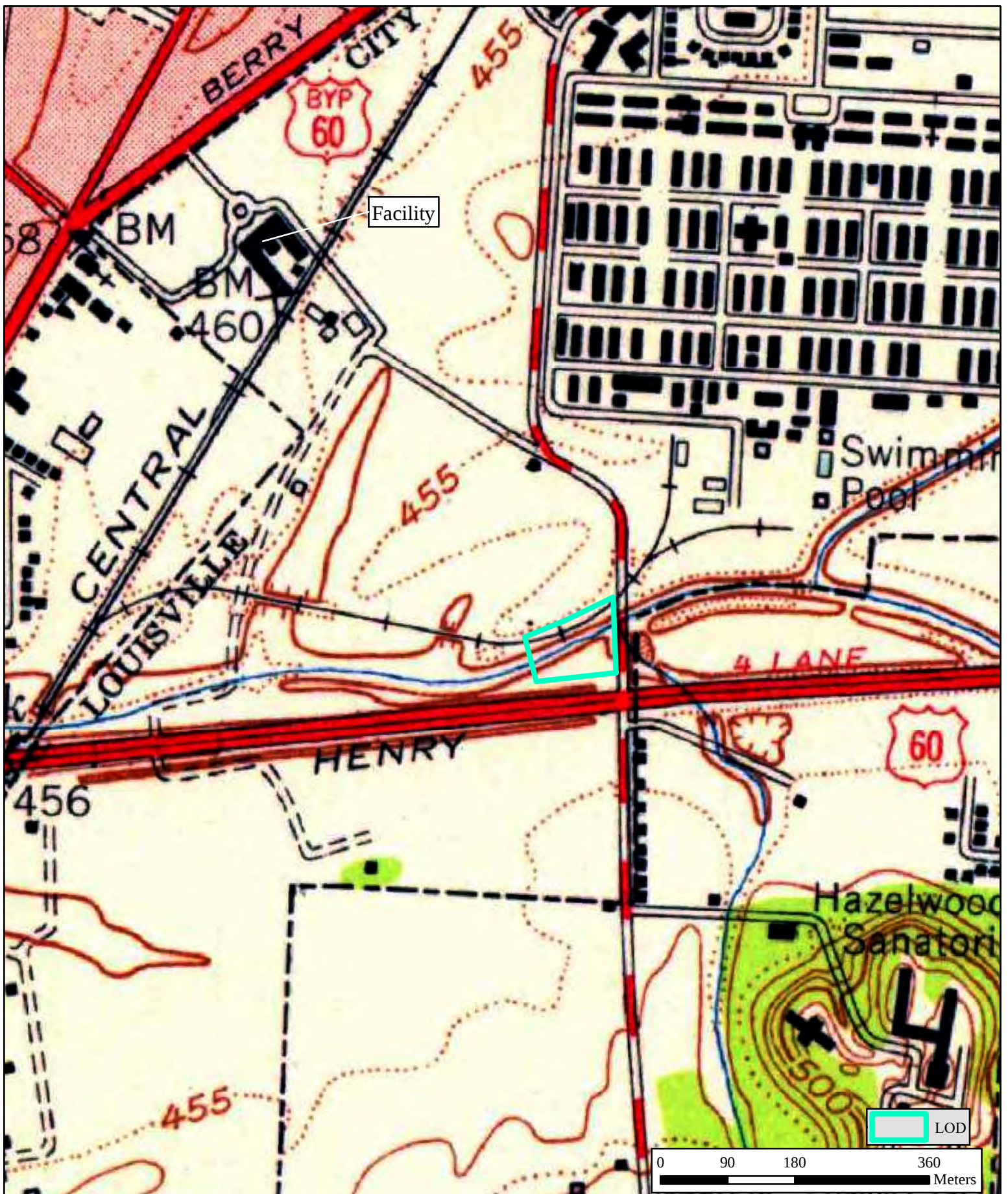


Figure 7

IWM Consulting Group, LLC
Adalynn Crossing Development Project
Louisville, Jefferson County, Kentucky

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7.5' USGS Topographic Map
1957 Louisville West, Kentucky Quadrangle

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Figure 8

IWM Consulting Group, LLC
Adalynn Crossing Development Project
Louisville, Jefferson County, Kentucky

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15' USGS Topographic Map
1959 Kosmosdale, Kentucky Quadrangle

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&
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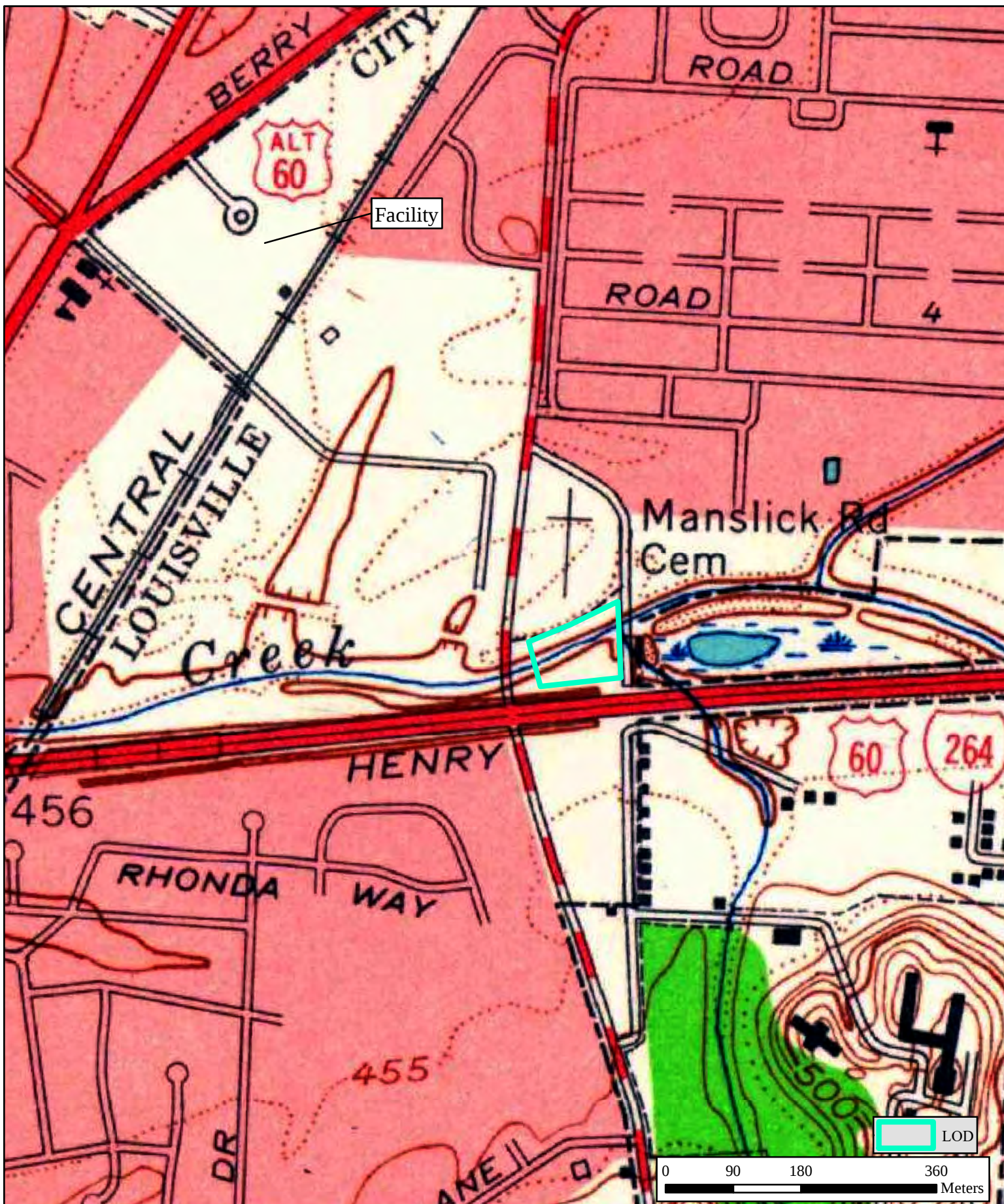


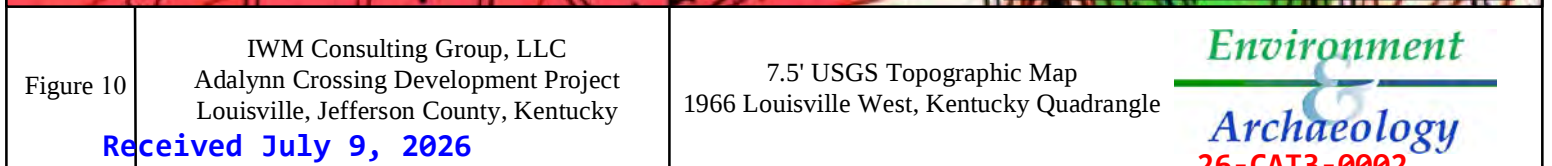
Figure 9

IWM Consulting Group, LLC
Adalynn Crossing Development Project
Louisville, Jefferson County, Kentucky

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7.5' USGS Topographic Map
1961 Louisville West, Kentucky Quadrangle

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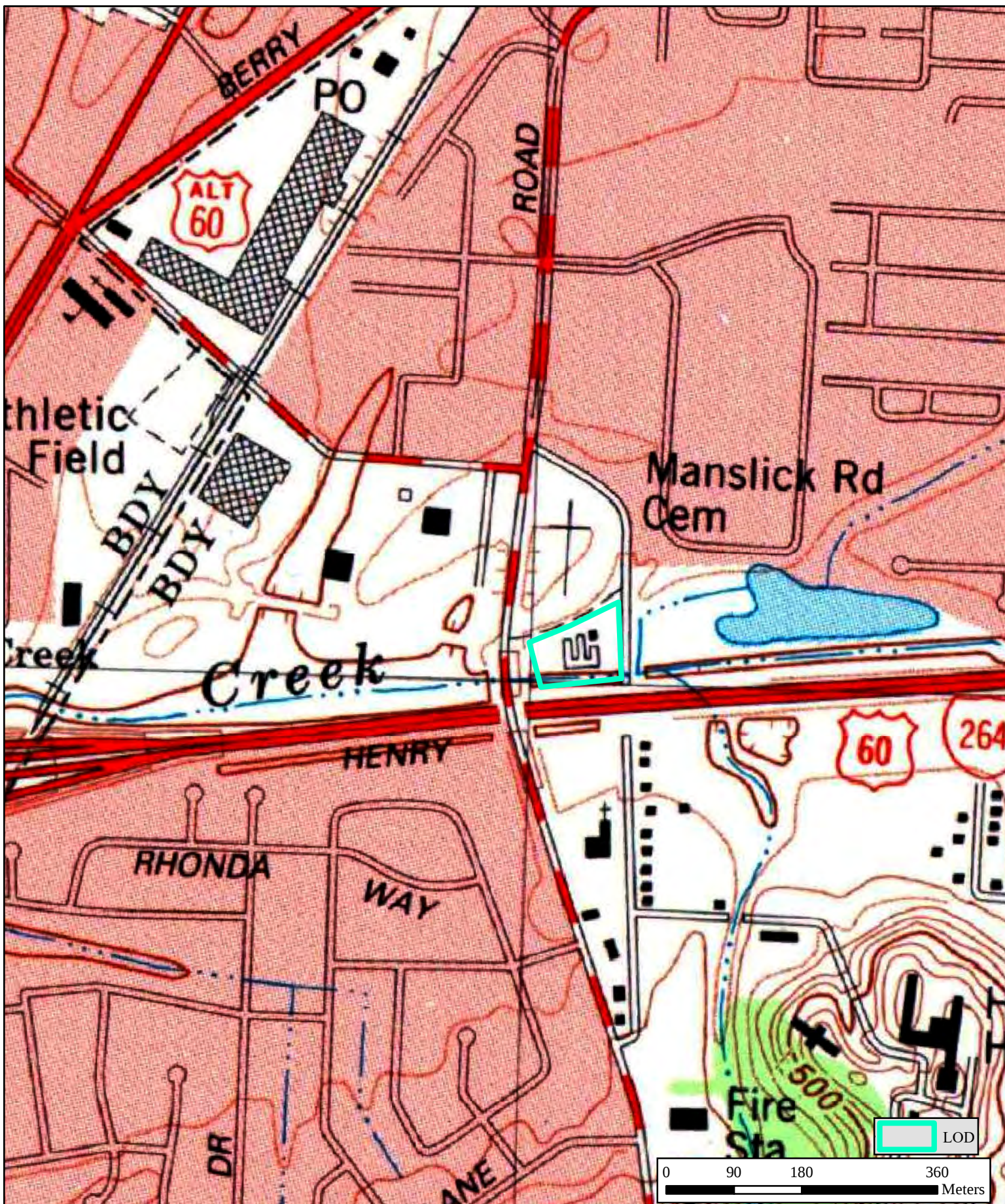


Figure 11

IWM Consulting Group, LLC
 Adalynn Crossing Development Project
 Louisville, Jefferson County, Kentucky

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7.5' USGS Topographic Map
 1984 Louisville West, Kentucky Quadrangle

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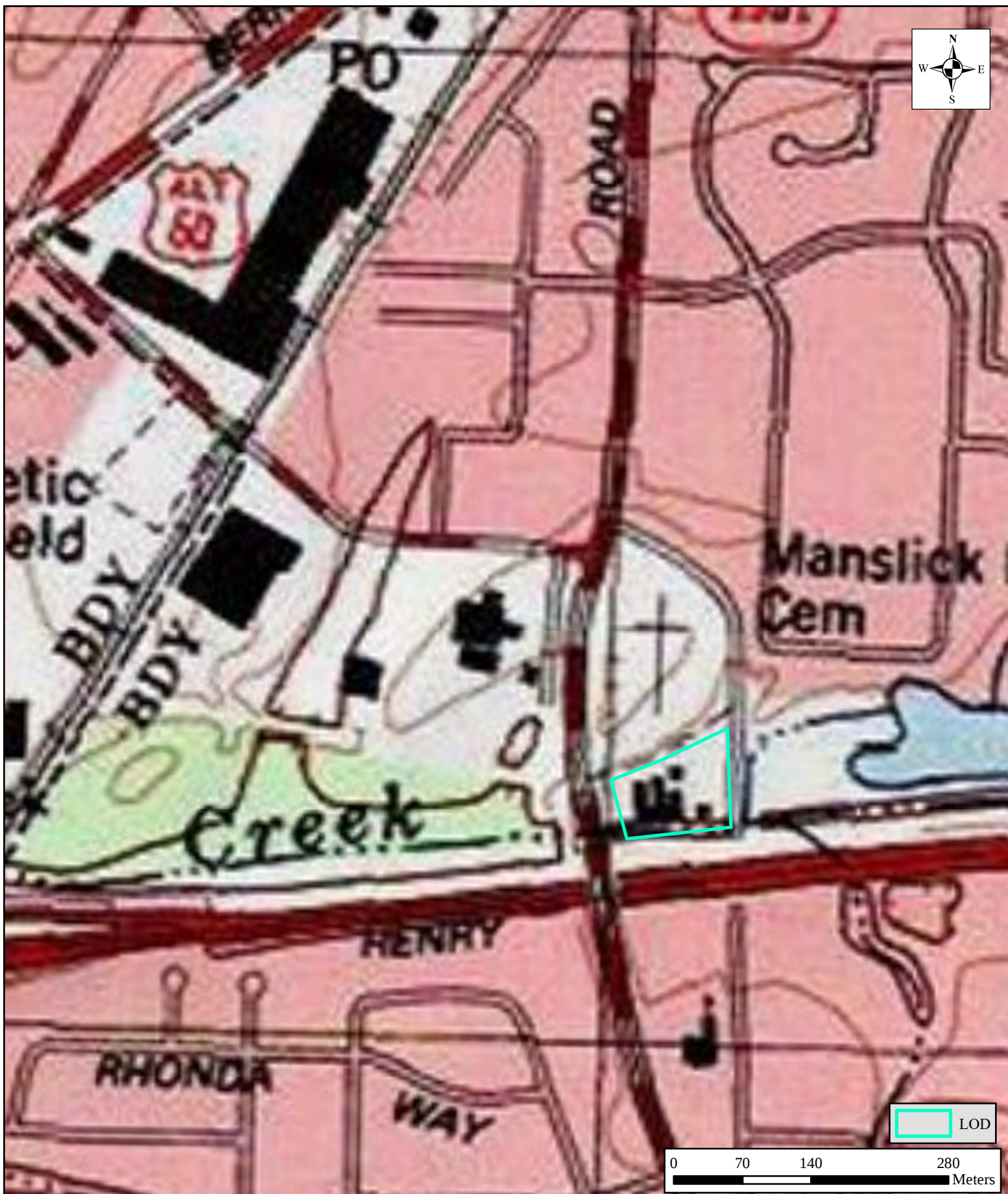


Figure 12

IWM Consulting Group, LLC
 Adalynn Crossing Development Project
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7.5' USGS Topographic Map
 2000 Louisville, Kentucky Quadrangle

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 &
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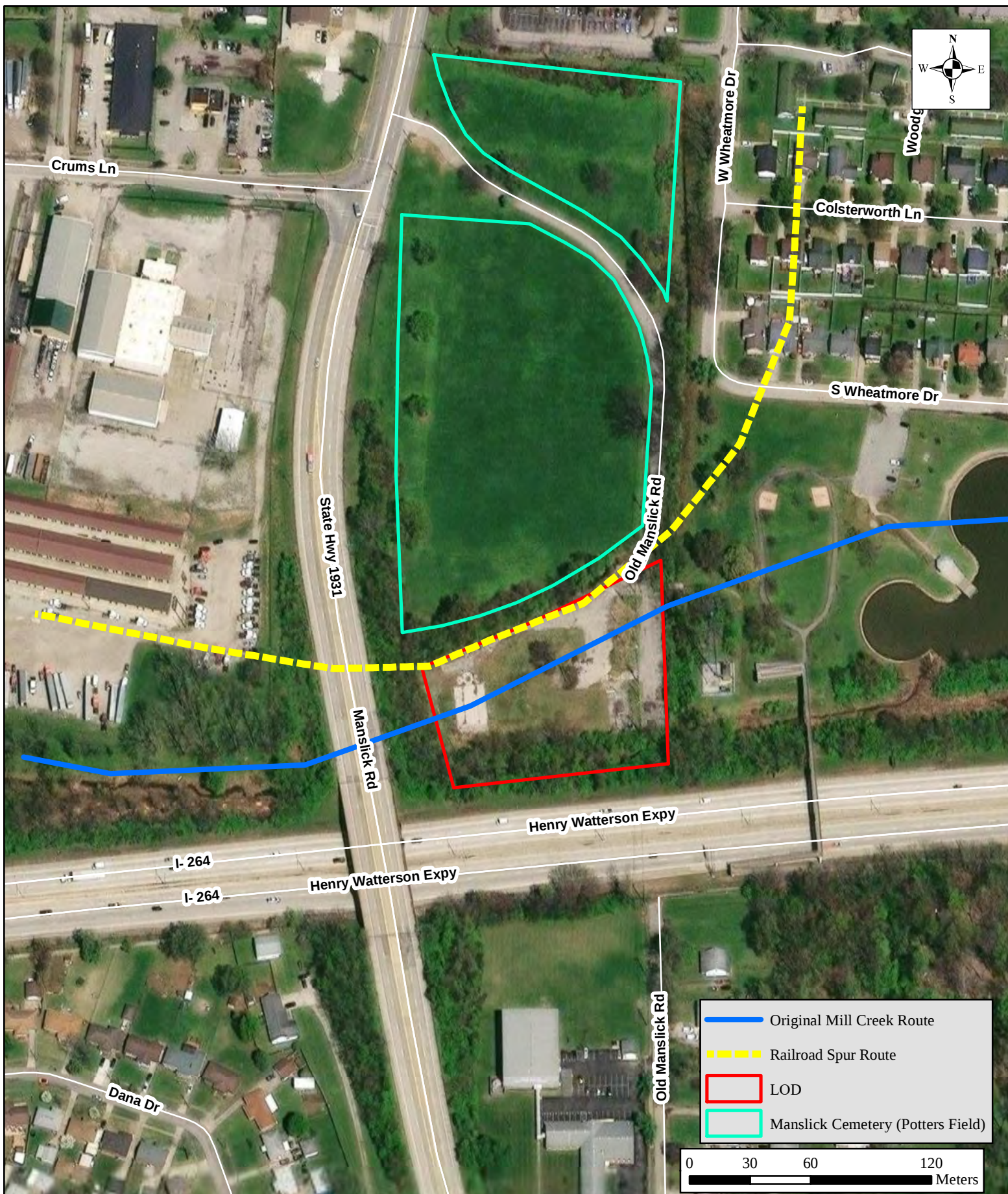


Figure 13

IWM Consulting Group, LLC
Adalynn Crossing Development Project
Louisville, Jefferson County, Kentucky

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Aerial with APE and
Manslick Cemetery Boundaries
Aerial Provided by ArcGIS Online

Environment
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Archaeology

26-CAT3-0002

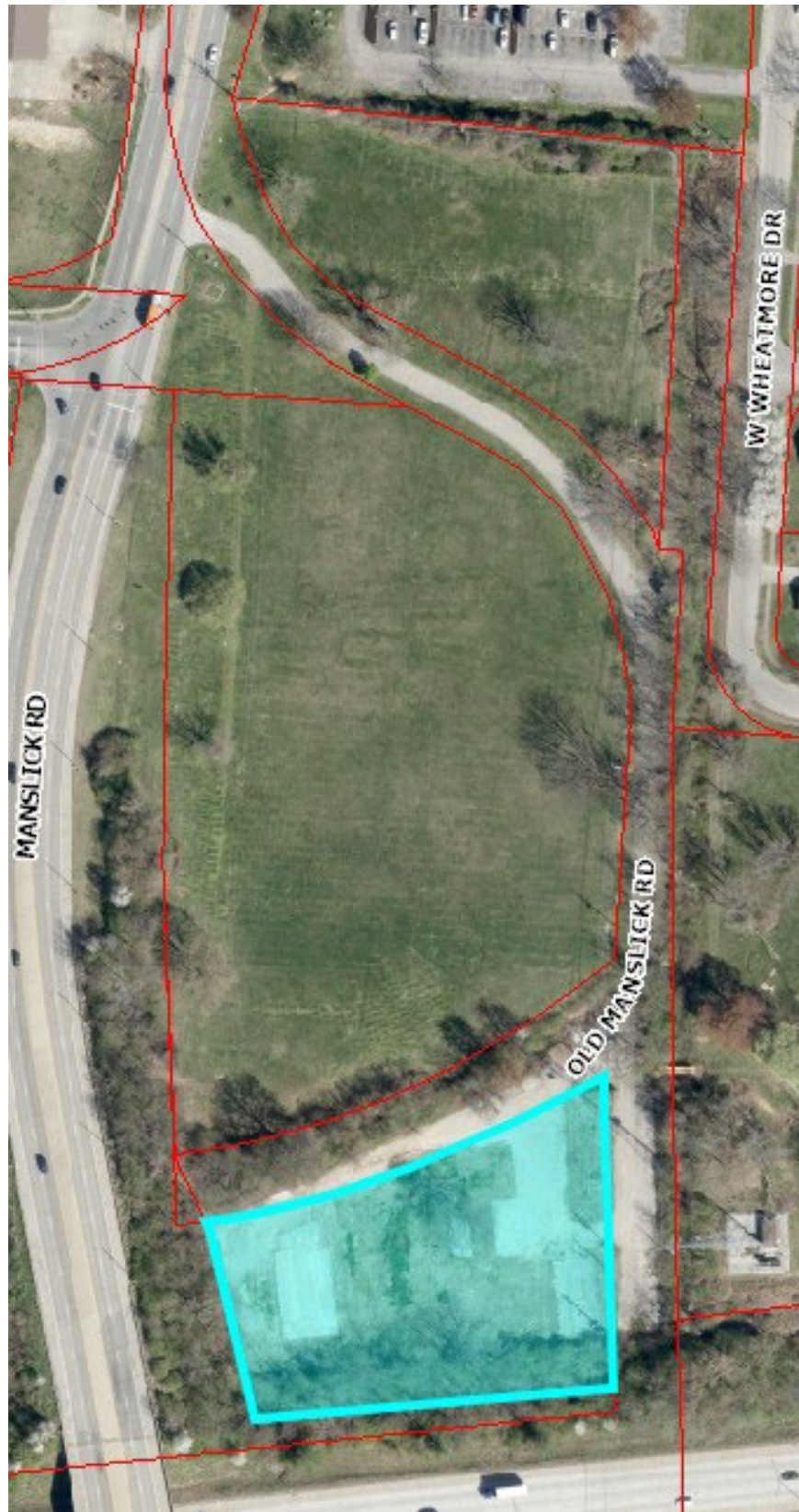


Figure 14. Cropped Image from the Jefferson County, Kentucky PVA website. The APE is the blue shape while the boundaries for the Manslick Cemetery are visible above it, outlined in red.



Figure 15

IWM Consulting Group, LLC
Adalynn Crossing Development Project
Louisville, Jefferson County, Kentucky

Received July 9, 2026

7.5' USGS Topographic Map
1961 Louisville West, Kentucky Quadrangle
with APE and Cemetery Boundaries

Environment
&
Archaeology
26-CAT3-0002

ATTACHMENT II:
Photolog

Photos	
Photo #: 1 Location: Adalynn Crossing Project APE Direction of Photo: Southwest Date: 7/2/2026 Description: View of cemetery sign.	
Photo #: 2 Location: Adalynn Crossing Project APE Direction of Photo: Southwest Date: 7/2/2026 Description: General overview of the Project area, as seen from near its NE-corner at the gated entrance.	
Photo #: 3 Location: Adalynn Crossing Project APE Direction of Photo: East-Northeast Date: 7/2/2026 Description: Overview of the northern portion of the Project area, as seen from near its NW-corner.	

Photos	
Photo #: 4 Location: Adalynn Crossing Project APE Direction of Photo: Northeast Date: 7/2/2026 Description: General overview of the Project area, as seen from its SW-corner.	
Photo #: 5 Location: Adalynn Crossing Project APE Direction of Photo: Northwest Date: 7/2/2026 Description: General overview of the Project area, as seen from near its SE-corner.	
Photo #: 6 Location: Adalynn Crossing Project APE Direction of Photo: North Date: 7/2/2026 Description: Overview of slab foundation within the western portion of the Project area.	

Photos	
Photo #: 7 Location: Adalynn Crossing Project APE Direction of Photo: North Date: 7/2/2026 Description: View of the graveled surface between the western limits of the Project area and the slab foundation.	
Photo #: 8 Location: Adalynn Crossing Project APE Direction of Photo: South-Southeast Date: 7/2/2026 Description: Overview of eastern portion of the Project area, as seen from near its NE-corner at the gated entrance.	
Photo #: 9 Location: Adalynn Crossing Project APE Direction of Photo: North Date: 7/2/2026 Description: Overview of eastern portion of the Project area, as seen from next to the dumpster onsite.	

Photos	
Photo #: 10 Location: Adalynn Crossing Project APE Direction of Photo: Southwest Date: 12/12/2025 Description: Overview of the gated entrance near the NE-corner of the Project area.	
Photo #: 11 Location: Adalynn Crossing Project APE Direction of Photo: South Date: 7/2/2026 Description: Overview of the paved and graveled area within the eastern portion of the Project area.	
Photo #: 12 Location: Adalynn Crossing Project APE Direction of Photo: East-Northeast Date: 7/2/2026 Description: Overview of the grassy area between the tree near the center of the Project area and the gated entrance near the NE-corner of the site. Note: <i>The ground exhibited no depressions and bare, non-vegetated spots across the grassy area revealed disturbed dirt from mechanical bulldozing.</i>	

Photos	
Photo #: 13 Location: Adalynn Crossing Project APE Direction of Photo: Southwest Date: 7/2/2026 Description: Overview of the grassy area across the center of the Project area and showing the standing tree near the center. Note: <i>No evidence of grave depressions were identified across the grassy areas of the site.</i>	
Photo #: 14 Location: Adalynn Crossing Project APE Direction of Photo: North Date: 7/2/2026 Description: Sewer manhole in the SW-corner of the Project area.	
Photo #: 15 Location: Adalynn Crossing Project APE Direction of Photo: North Date: 7/2/2026 Description: View of one of several stormwater system grates within the eastern portion of the Project area. Note: <i>This stormwater system appeared to drain southward towards Mill Creek.</i>	

Photos	
Photo #: 16 Location: Adalynn Crossing Project APE Direction of Photo: West Date: 7/2/2026 Description: View of one of several disturbed spots with low vegetative cover within the grassy portion of the Project area. <i>Note: The exposed ground exhibited indicators that the site had been mechanically graded / turned.</i>	
Photo #: 17 Location: Adalynn Crossing Project APE Direction of Photo: Southwest Date: 7/2/2026 Description: Overview of the paved southwest end of Old Manslick Road at the gated entrance into the Project area.	
Photo #: 18 Location: Adalynn Crossing Project APE Direction of Photo: North Date: 7/2/2026 Description: Overview of Old Manslick Road, north of the Project area, showing the Manslick Cemetery along its western side.	

UNANTICIPATED DISCOVERIES AND EMERGENCY PROCEDURES

Because archeological or historical sites are occasionally discovered during construction projects, a plan has been developed for the proposed Adalynn Crossing Development Project (Project), Louisville, Jefferson County, Kentucky, in the event of such discoveries. The proposed Project is being developed by Adalynn Crossing, Limited Partnership (ACLP), and the Lead Federal Agency has been identified as the Office of Housing and Urban Development (HUD).

When the initial steps in the Section 106 compliance process (identification and evaluation of historic properties) indicate that historic properties may be discovered during an undertaking, a plan generally is developed for the treatment of such properties. The plan is included in any documentation submitted to HUD and the State Historic Preservation Office (SHPO) as part of the effort to assess the effects of the undertaking in compliance with Federal Regulation 36 CFR 800. In the State of Kentucky, the Kentucky Heritage Council (KHC) acts as the SHPO. This document represents such a plan.

Unanticipated Cultural Resources

If any member of the Project construction work force believes that he or she has found a cultural resource discovery, all work within a 100-foot (30-meters) radius of the discovery will stop, and the Construction Manager/Environmental Inspector will be notified. The area of work stoppage will be adequate to provide for the security, protection, and integrity of the materials. A cultural resource discovery could consist of, for example:

- An area containing charcoal or charcoal-stained soil;
- An arrowhead, stone tool, or stone chips;
- A cluster of bones or burned rocks in association with stone tools or chips; or
- A cluster of glass bottles and/or other domestic refuse appearing older than 50 years.

If previously undocumented cultural resources are discovered, several steps will be undertaken:

- Initially, ACLP will make reasonable efforts to avoid or minimize damage to the resource, as specified in 36 CFR 800.13(b).
- At a minimum, the immediate area of the discovery site will be flagged. Vehicles and equipment will not be permitted to travel on the discovery site.
- Work in the immediate area will not be re-started until treatment of the discovery has been completed.
- The consulting parties, identified as the HUD, KHC, the local coroner, the local police, and any Native American tribes who have expressed an interest in the Project will be contacted within 24 hours and advised of the discovery (see contact list below).
- ACLP will provide a professional archeologist to undertake an evaluation of the National Register of Historic Places (NRHP) eligibility of the resource, applying the NRHP Criteria for Evaluation (36 CFR §60.4 [a-d]).
- As much information as possible concerning the cultural resource, including characterization of the resource type (e.g., archeological, or architectural), its location and size, and any information on its eligibility for listing in the NRHP, will be provided to the consulting parties.

The consulting parties will be provided with an opportunity to review and comment on the need for additional examination of the find. If the consulting parties concur that the resource is not eligible for listing in the NRHP, they will notify ACLP of their determination. If the consulting parties concur that the resource is National Register eligible, ACLP will avoid adverse impacts on the resource. However, if

avoidance is not feasible, a treatment plan for mitigating adverse effects to the cultural resource will be prepared. This plan will be submitted to the consulting parties for review and comment. It will be the policy of ACLP to avoid further destruction of the resource until the approved formal data recovery or other mitigation plan can be implemented.

Unanticipated Discovery of Human Remains

The discovery and/or disturbance of human remains is a sensitive issue that must be addressed if a prehistoric burial site, an unmarked grave, or a cemetery is impacted by planned construction. It shall be the policy of ACLP, its agents, and subcontractors to treat all discovered human remains with dignity and respect. In addition, ACLP, its agents, and subcontractors will comply with the requirements related to the discovery of human remains and specified by the National Historic Preservation Act of 1966 (NHPA), as amended, the Native American Graves Protection and Repatriation Act (NAGPRA), and any and all applicable state and local regulations regarding human remains. As with the unexpected discovery of cultural resources during construction, consulting parties will be contacted within 24 hours and advised of the discovery. The additional steps to be followed are presented below.

- All sub-surface work within a 100-foot (30-meter) radius of the find will cease at once. The work stoppage area will be adequate to provide for the security, protection, and integrity of the remains. The lead Construction Manager/Environmental Inspector will be notified immediately.
- If preliminary identification by the Project archaeologist indicates the remains are human, the consulting parties, the Jefferson County Sheriff, and/or Jefferson County Coroner will be notified at once.
- The sheriff and/or coroner shall assess the nature and age of the human skeletal remains. Following federal and state provisions, if the coroner determines that the remains are not a crime scene and are older than 50 years of age, the HUD, in coordination with KHC and interested Native American tribes, have jurisdiction over the remains and will coordinate with the appropriate stakeholders to ensure compliance with existing laws. If the sheriff/coroner determine that the remains may represent a crime scene, they will assume jurisdiction over the remains.
- No remains will be removed from the site until jurisdiction is established.
- If after initial examination of the burial site, during which the bones will be disturbed as little as possible, the cultural affiliation of the remains is still in doubt, a professional forensic or physical anthropologist with experience in field identification will be invited to visit the scene to make a determination.

Once the ethnic affiliation has been determined, the sheriff will attempt to identify and notify next of kin or lineal descendants. If the remains are found not likely to be Native American, and if modification of construction plans to avoid impact is not feasible, a decision by the consulting parties will be made to excavate the remains in accordance with a Burial Permit issued by KHC's Board of Trustees, and with state standards of record-keeping, care, and curation. In accordance with state law, the remains would be reburied at a cemetery agreed upon by the consulting parties. If the remains are likely Native American, procedures outlined above will be followed and work would be conducted in accordance with the requirements of the NAGPRA.

If Project modification to avoid the burial is feasible, the area around the interment which would be subject to Project impact will be archeologically investigated to determine whether or not additional grave sites might be present. This work would be conducted in accordance with a plan agreed upon by the consulting parties.

Contact List

Agency/Stakeholder	Contact Person	Phone Number	Mailing Address
Federal Contacts			
Office of Housing and Urban Development (HUD)	TBD	TBD	TBD
State and Local Contacts			
Kentucky Heritage Council (KHC)	Craig Potts, State Historic Preservation Officer	(502) 564-7005	410 High Street Frankfort, KY 40601
Jefferson County, KY Sheriff	TBD	TBD	TBD
Jefferson County, KY Coroner	TBD	TBD	TBD
Environmental Consultant			
TBD	TBD	TBD	TBD
Interested Native American Tribes			
TBD	TBD	TBD	TBD