



April 5, 2024

Marty Marchaterre, Senior Environmental Planner
Copperhead Environmental Consulting, Inc.
133 Walton Avenue
Lexington, Kentucky 40508

**RE: Cultural Historic Site Reconnaissance for the proposed Lost City Solar Project in Muhlenberg County, Kentucky
CRA Project Number: K240102
Contract Publication Series: 24-116**

Dear Mr. Marchaterre,

On March 26, 2024, Cultural Resource Analysts, Inc. (CRA), personnel completed a cultural historic site reconnaissance study for the proposed Lost City Solar project east of Penrod, Muhlenberg County, Kentucky. The study was conducted at the request of Marty Marchaterre of Copperhead Environmental Consulting, Inc., and represents due diligence efforts since compliance with Section 106 of the National Historic Preservation Act was not required for the current proposed project. The cultural historic overview study examined the study area, which comprises approximately 1,300 acres of project property and a 1,000 ft buffer (Figures 1 and 2). The study area is bounded to the north by KY 949, to the south by Mason-Poyner Road, and to the west by US 431. Property boundaries form the study area's eastern boundary and largely pass through wooded areas near Ware Ridge and Huckleberry Knob. The objective of the overview study is to identify properties or districts within the study area, to the extent possible from the existing public roadways, that are potentially significant, listed, or eligible for listing in the National Register of Historic Places (NRHP) that should be taken into consideration as the project plans develop. This letter report was prepared by architectural historian John Dickerson, MA, of CRA.

CRA personnel completed an online review of the Kentucky Heritage Council (KHC) Site Check Web Service (Beta) online database on March 21, 2024. Information reviewed indicates no previously identified resources are located within or directly adjacent to the study area. Further, a review of surveys and reports on file at the KHC did not reveal any previously completed cultural historic reports with an area of potential effects (APE) and/or study areas that overlaps the current study area.

The study area was subject to a windshield survey from the public right-of-way (ROW). John Dickerson of CRA completed the windshield survey on March 26, 2024. To the extent possible, the fieldwork noted the locations of any potentially significant properties that should be taken into consideration during project planning. No additional potentially significant properties or potential historic districts other than those mentioned in this report were identified during the windshield survey. All surveyed resources are identified on a topographic quadrangle map and aerial image (see Figures 1 and 2).

A search of the Geographic Information System database of the National Park Service (NPS) confirms that no NRHP-listed sites are located in or adjacent to the study area.

Three potentially significant resources (CRA 1–3), were identified during the overview survey and are depicted on the 1953 Dunmore, Kentucky, 7.5-minute series topographic quadrangle (United States Geological Survey [USGS] 1953) (see Figure 1). Of these, CRA 1 is located outside of the study area but is on a parcel intersected by the APE (Table 1).

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Table 1. Surveyed Architectural Resources in and Adjacent to Study Area.

Site/Survey No.	Resource Name/Function	Address/Location	NRHP Status	Condition	Figure Nos.
CRA 1	Wood Cemetery	KY 949	Undetermined based on CRA windshield survey	Maintained	3–6
CRA 2	Welborn Cemetery	Mason-Poyner Road	Undetermined based on CRA windshield survey	Overgrown/Under maintained	7–11
CRA 3	Railroad grade and culvert	East side of US 431	Potentially significant based on CRA windshield survey	Abandoned/Under maintained	12–15

CRA 1 consists of the Wood Cemetery and is located on the east side of KY 949, approximately 1,400 ft southeast of its intersection with Union Ridge Road. The cemetery is situated on an approximately 2.6-acre parcel that includes deciduous trees and is accessed by a gravel road (see Figures 1 and 2). Wood Cemetery is not depicted on any of the maps reviewed (Kentucky Department of Highways [KDH] 1937; Kentucky State Highway Department [KSHD] 1950, 1957; USGS 1911, 1914, 1953).

Wood Cemetery contains approximately 70 burials and is located on a grassy ridge overlooking the proposed project area (Figures 3 and 4). Inscriptions observed during the current investigation indicate the earliest burial occurred in 1833 and belongs to Elias Baker (see Figure 4). February 29, 2020, is the most recent burial date observed and belongs to Nell P. King (Figure 5). Additional surnames observed include: Woolridge, Baker, and Gapdner.

Oriented east to west, gravemarker types include cross-gable obelisk, arched upright tablets, and arched upright tablets with rounded shoulders. The gravemarkers were constructed primarily of limestone, and iconography observed included hands shaking and pointing upwards, floral designs, and Masonic symbols. A single US Civil War gravemarker was observed and presents a marble tablet with a recessed shield and raised lettering (Figure 6). Modern gravemarkers feature polished granite and represent multiple burials.

The National Register Criteria Considerations stipulate that for a burial site or cemetery to be considered individually eligible for the NRHP, it must satisfy Criteria Consideration D (NPS 2008). Criteria Consideration D states that a cemetery may be eligible for the NRHP if it derives its primary importance from the graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events. The Wood Cemetery serves as the burial site of family members from the immediate area and therefore does not have a significant concentration of persons of transcendent importance to the region. Additionally, research did not associate the cemetery with events of historic significance. Therefore, the cemetery is recommended not eligible for listing under Criterion A or B.

Private family cemeteries established in the nineteenth century are common in the region, and the Wood Cemetery is not unique in its age or design compared to other rural cemeteries in Muhlenberg County. The Wood Cemetery does not display exceptional architectural design or artistic distinction. The layout as well as the materials and embellishments of the monuments are consistent with those found in community and family cemeteries throughout Muhlenberg County and western Kentucky. As such, the cemetery is not eligible for listing in the NRHP under Criterion C.

Therefore, CRA recommends that the Wood Cemetery (CRA 1) does not satisfy the requirements of Criteria Consideration D for listing a cemetery in the NRHP and is therefore ineligible for listing in the NRHP under Criterion A, B, or C.

CRA 2 is the location of the Welborn Cemetery and is located north of Mason-Poyner Road, approximately 1,440 ft east-northeast of its intersection with US 431. The cemetery is situated on an approximately 260.3-acre parcel that includes forested area and agricultural fields (see Figures 1 and 2). An unimproved driveway provides access to the cemetery from Mason-Poyner Road and is covered with leaf litter. Welborn Cemetery is not depicted on any of the maps reviewed (KDH 1937; KSHD 1950, 1957; USGS 1911, 1914, 1953).

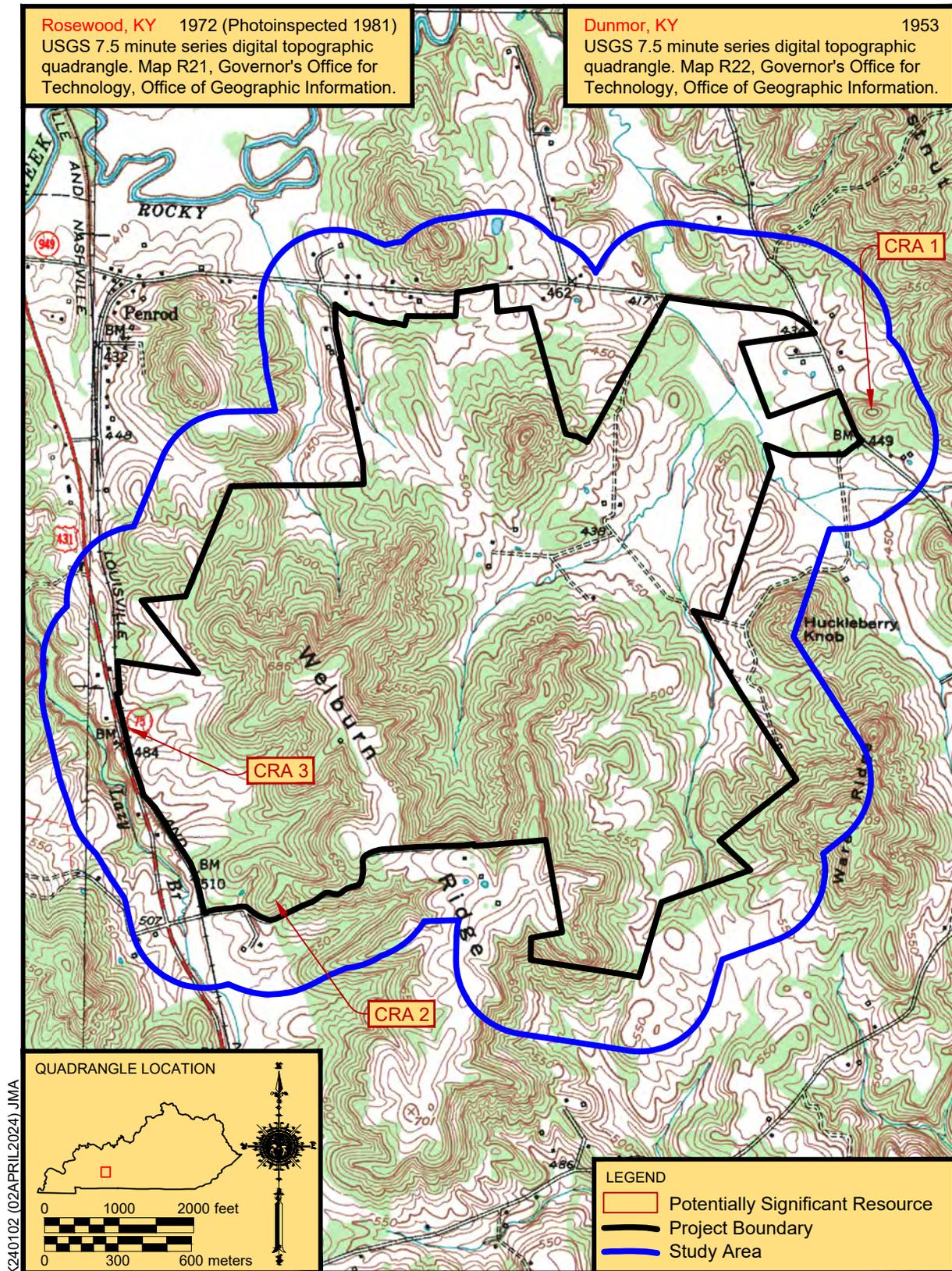


Figure 1. Topographic map depicting the study area and locations of resources within and adjacent to the study area.

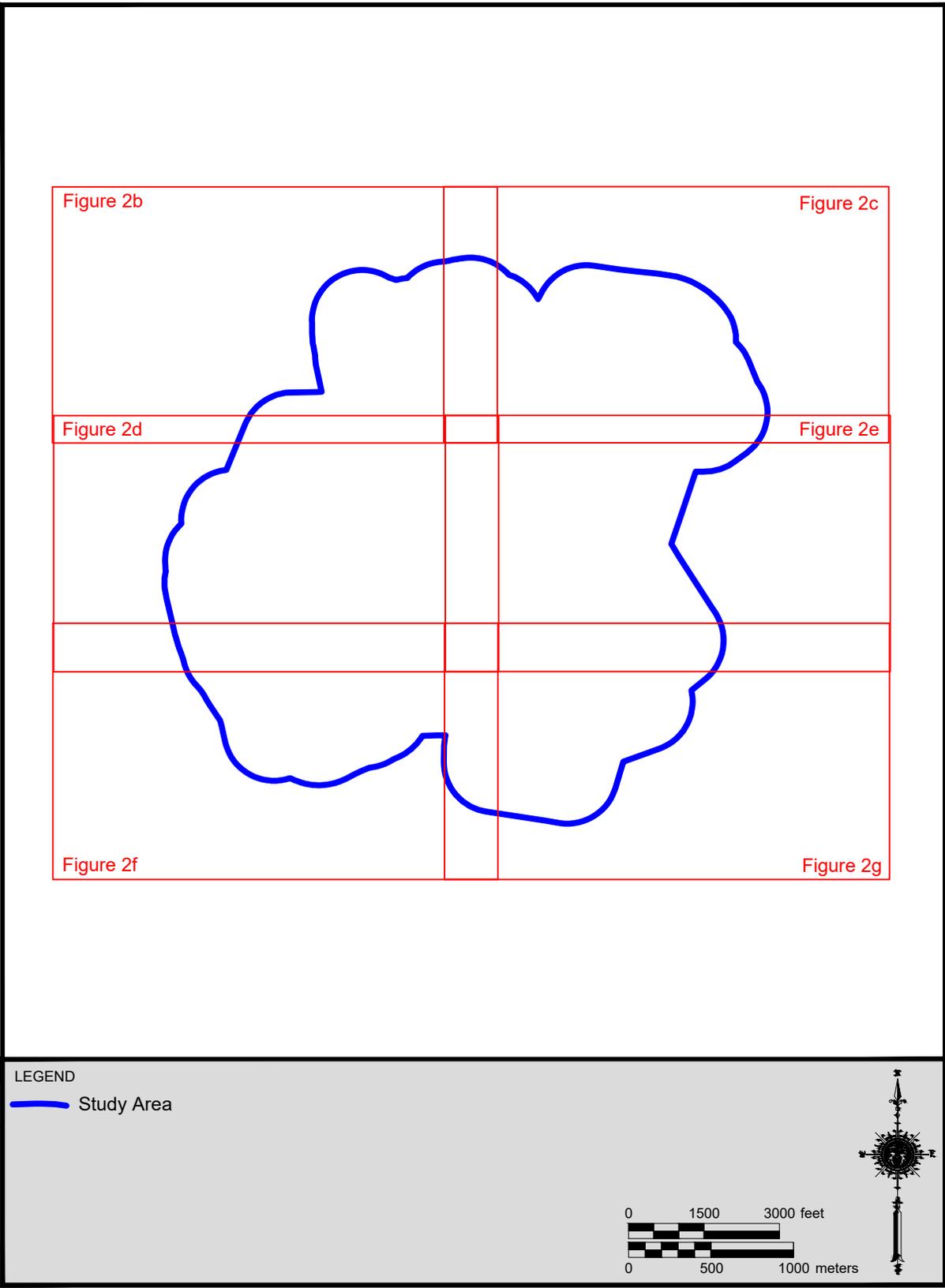


Figure 2a. Aerial photograph depicting the study area and locations of resources within and adjacent to the study area (KEY).

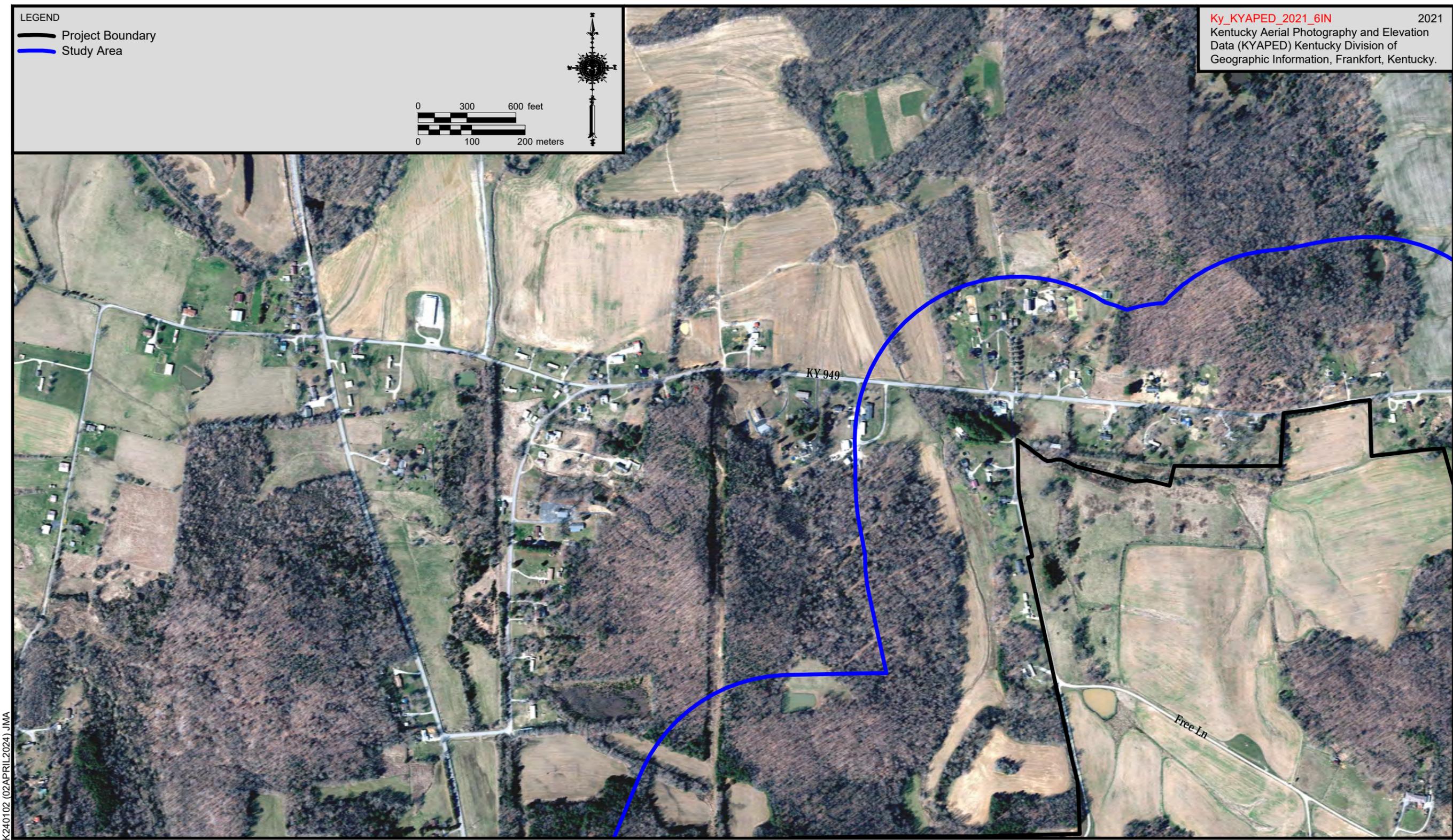


Figure 2b. Aerial photograph depicting the study area and locations of resources within and adjacent to the study area.

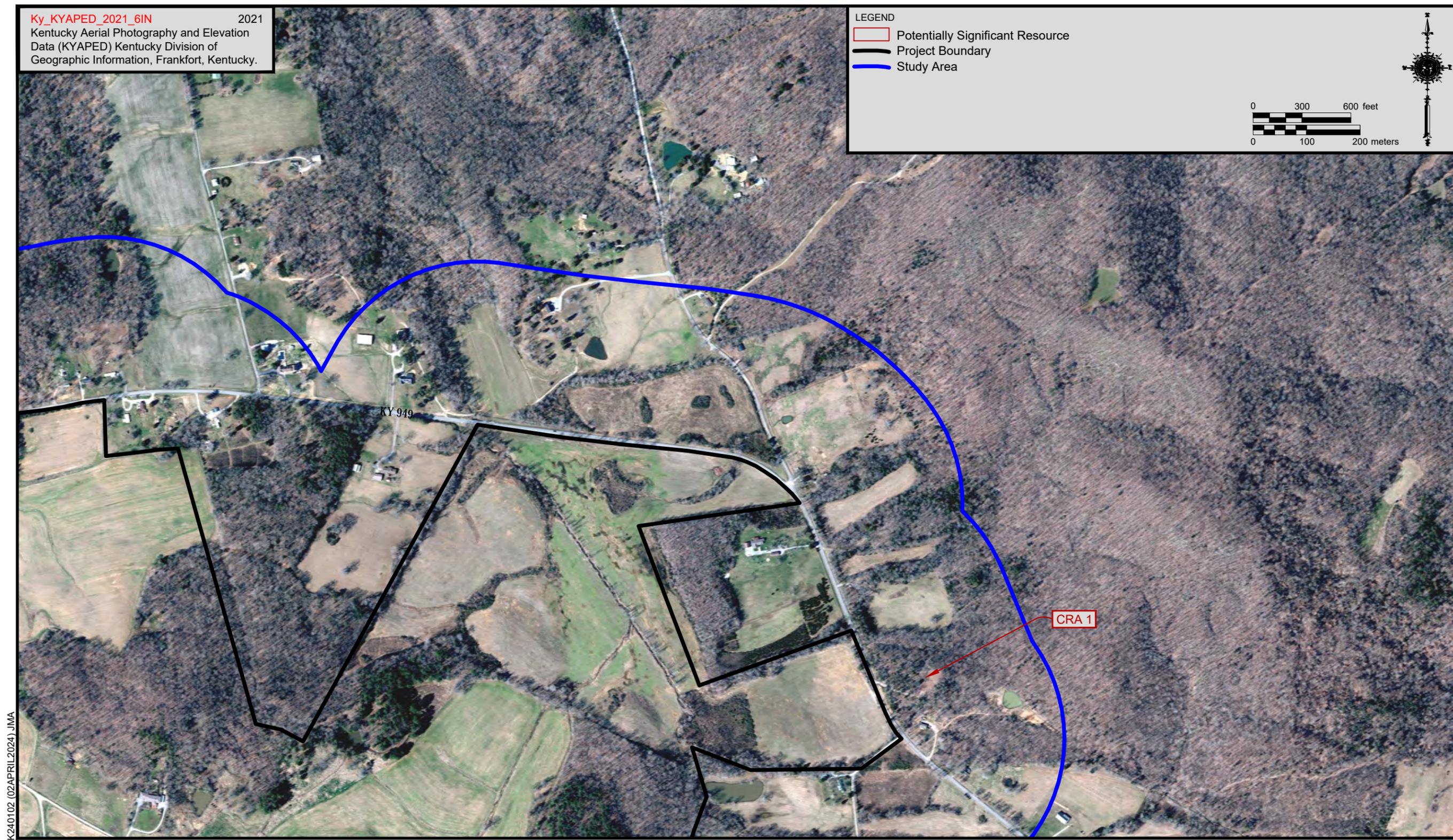


Figure 2c. Aerial photograph depicting the study area and locations of resources within and adjacent to the study area.

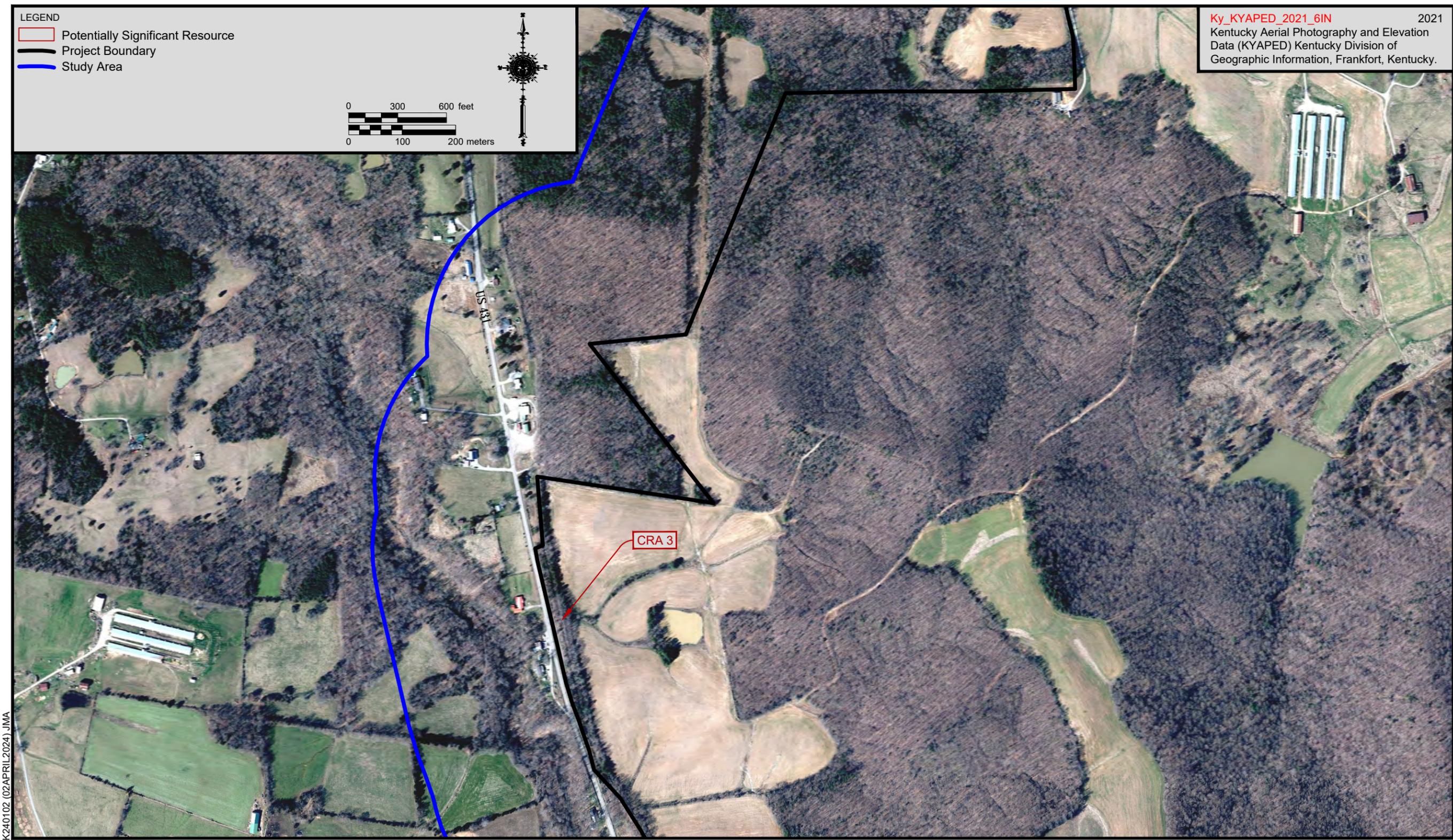


Figure 2d. Aerial photograph depicting the study area and locations of resources within and adjacent to the study area.

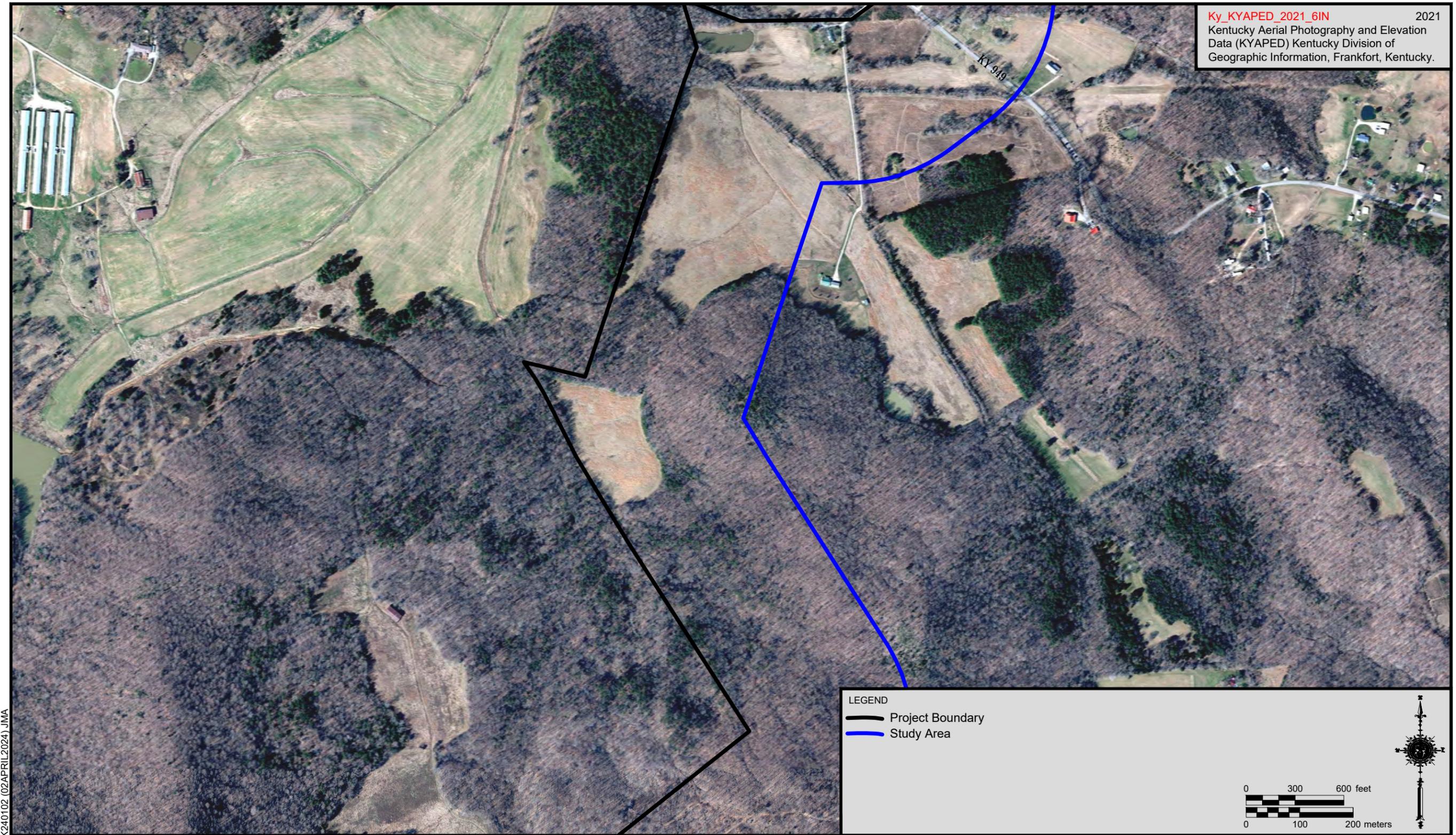


Figure 2e. Aerial photograph depicting the study area and locations of resources within and adjacent to the study area.

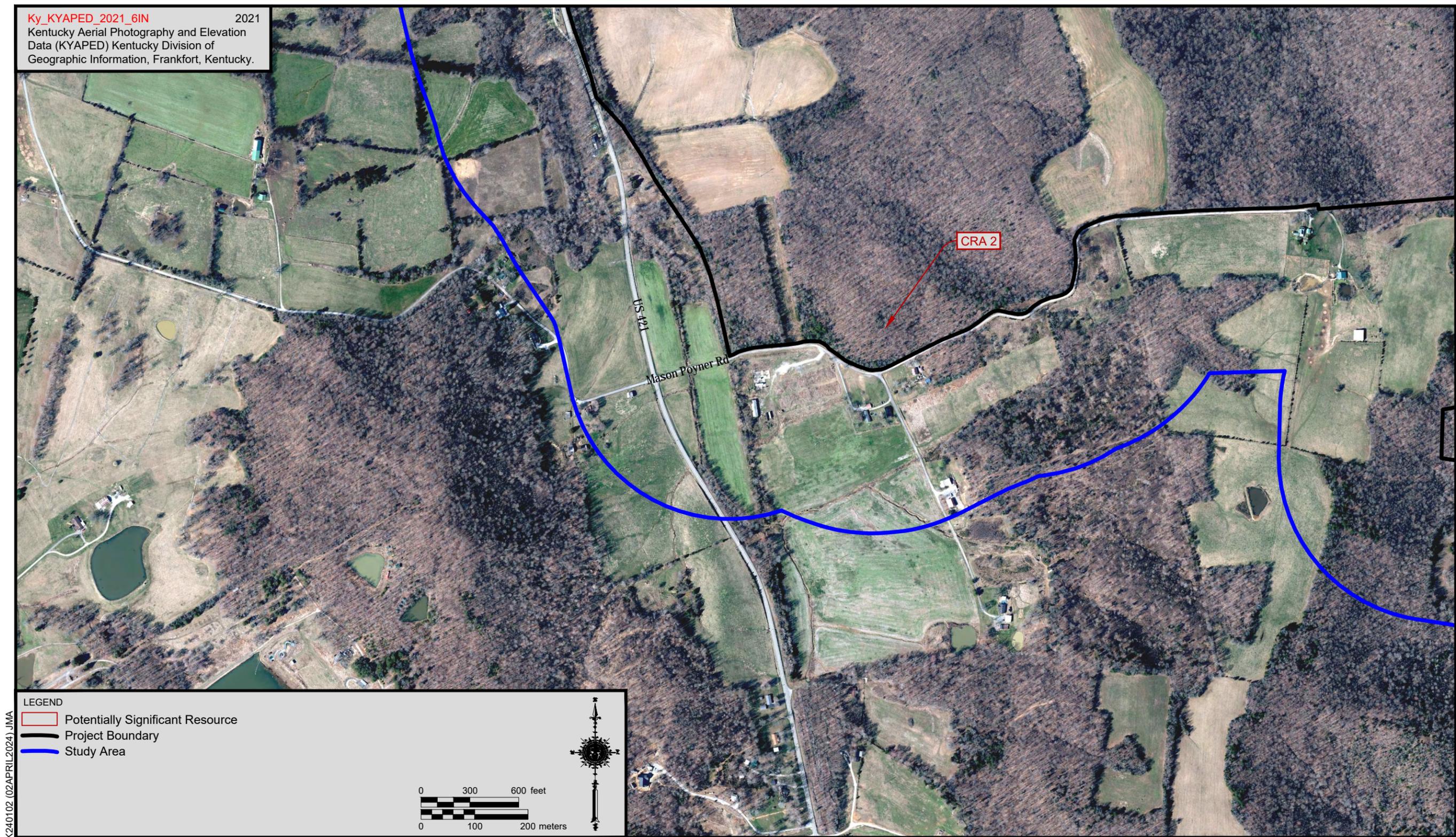


Figure 2f. Aerial photograph depicting the study area and locations of resources within and adjacent to the study area.

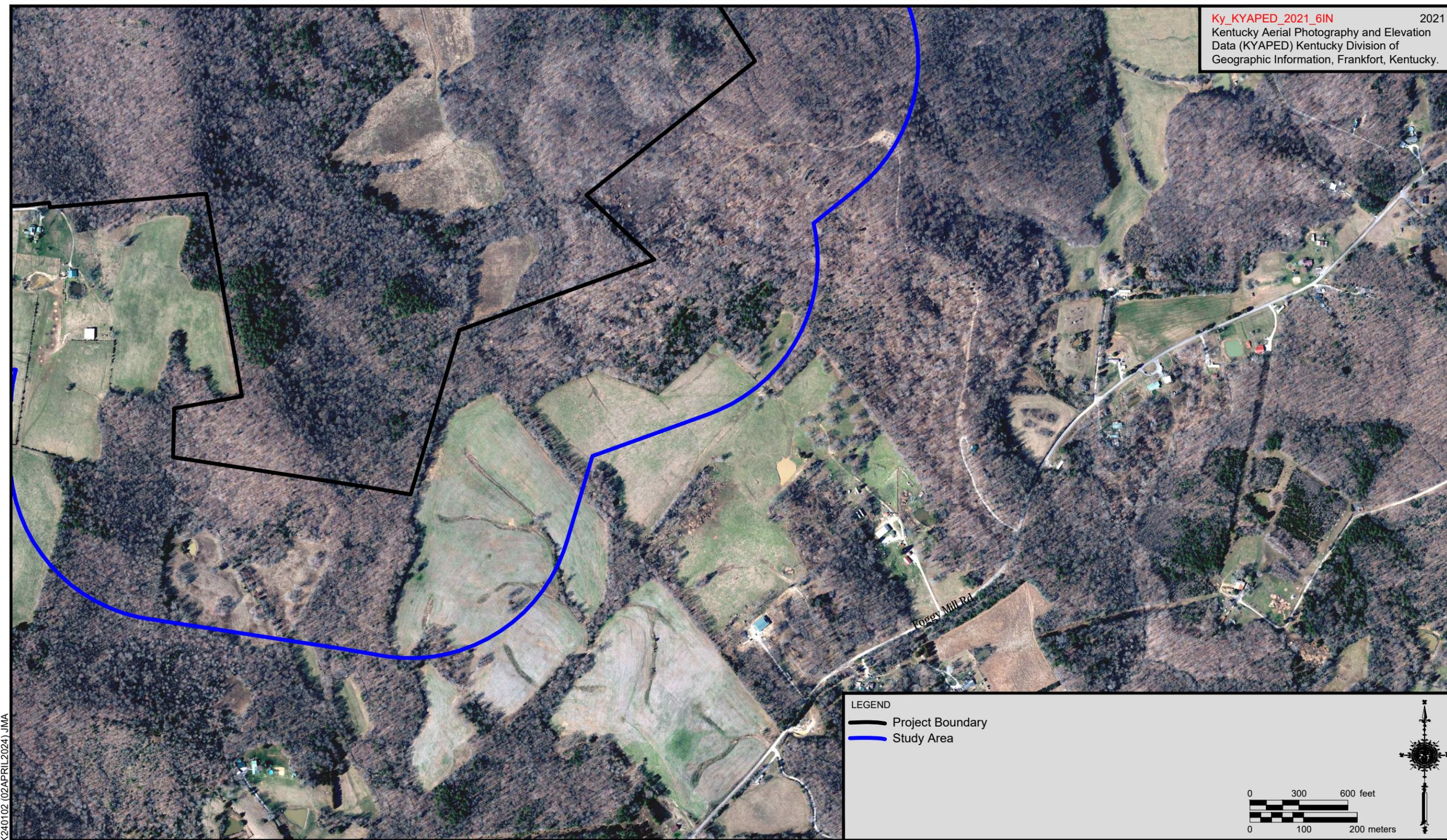


Figure 2g. Aerial photograph depicting the study area and locations of resources within and adjacent to the study area.



Figure 3. CRA 1: Overview of the Wood Cemetery, looking north.



Figure 4. CRA 1: Overview of the Wood Cemetery, looking west.



Figure 5. CRA 1: Overview of the Wood Cemetery showing recent burial, looking south-southwest.



Figure 6. CRA 1: West elevation of the US Civil War gravemarker, looking east.

Approximately 20 burials were observed in the Welborn Cemetery, which is situated on the west-southwest end of an upland ridge lobe in the southwest portion of the proposed project area (Figures 7 and 8). The earliest observed death date belongs to Milton M. Welborn and occurred on June 11, 1887 (Figure 9). Located nearby is the burial of Cora B. Welbon, which lists a death date of March 13, 1888. These burials likely represent the cemetery's namesake. No modern burials were observed during the investigation and the cemetery appears to no longer be in use. Observations made during the current investigation suggest the cemetery is not maintained and portions have become overgrown with underbrush (see Figure 8).

Arranged east to west, gravemarker types include cross-gable obelisk, gable tablets, arched upright tablets with rounded shoulders, and cut sandstone slab markers. The gravemarkers are primarily of limestone construction, and iconography observed included floral designs and a sleeping lamb. The cut sandstone slab markers are mainly rectangular in shape, are topped by horizontal stone slabs with inscriptions, and rest on sandstone slabs resting directly on the ground surface (see Figure 7; Figure 10). One sandstone slab marker was observed to have been carved in the shape of a coffin (Figure 11).

The National Register Criteria Considerations stipulate that for a burial site or cemetery to be considered individually eligible for the NRHP, it must satisfy Criteria Consideration D (NPS 2008). Criteria Consideration D states that a cemetery may be eligible for the NRHP if it derives its primary importance from the graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events. The Welborn Cemetery represents the burial site of family members from the immediate area and therefore does not have a significant concentration of persons of transcendent importance to the region. Additionally, research did not associate the cemetery with events of historic significance. Therefore, the cemetery is recommended not eligible for listing under Criterion A or B.



Figure 7. CRA 2: Overview of the Welborn Cemetery, looking north.



Figure 8. CRA 2: Overview of the Welborn Cemetery, looking northeast.



Figure 9. CRA 2: East elevation of the Milton M. Welborn gravemarker, looking west.



Figure 10. CRA 2: Overview of the cut sandstone slab gravemarker at the Welborn Cemetery, looking west.



Figure 11. CRA 2: Overview of the coffin-shaped cut sandstone slab gravemarker at the Welborn Cemetery, looking east.

Private family cemeteries established in the nineteenth century are common in the region, and the Welborn Cemetery is not unique in its age or design compared to other rural cemeteries in Muhlenberg County. The Welborn Cemetery does not display exceptional architectural design or artistic distinction. The layout as well as the materials and embellishments of the monuments are consistent with those found in community and family cemeteries throughout Muhlenberg County and western Kentucky. As such, the cemetery is not eligible for listing in the NRHP under Criterion C.

Therefore, CRA recommends that the Welborn Cemetery (CRA 2) does not satisfy the requirements of Criteria Consideration D for listing a cemetery in the NRHP and is therefore ineligible for listing in the NRHP under Criterion A, B, or C.

Located east of US 431, approximately 2,710 ft north of its intersection with Mason-Poyner Road, CRA 3 features an abandoned railroad grade and cut limestone culvert (Figures 12 and 13). CRA 3 is located within the proposed project area on an approximately 260.3-acre parcel that includes forested areas and agricultural fields (see Figures 1 and 2). The Louisville and Nashville Railroad is first mapped at or near this location on the 1911 Dunmor, Kentucky, 15-minute series topographic quadrangle map (USGS 1911).

The section of the abandoned railroad grade located within the project area measures approximately 1,840 ft and is oriented northwest to southeast and parallels US 431. Varying in height, the abandoned grade features sloping sides overgrown with brush and deciduous trees (see Figure 12). Observations made during the current investigation indicate the rails and ties are no longer present (Figure 14).

A cut limestone culvert is located beneath the abandoned railroad grade and provides drainage for an unnamed creek (see Figure 13). Traveling a linear path beneath the grade, the culvert presents a single-cell form constructed of un-mortared, rectangular, rough cut, limestone blocks. The floor of the culvert's interior presents cut line blocks (Figure 15). Featuring stepped wing walls positioned to follow the angle of the built-up railroad bed, the culvert is five courses in height.



Figure 12. CRA 3: Overview of the abandoned railroad grade, looking southeast.



Figure 13. CRA 3: West elevation of the cut limestone railroad culvert, looking northeast.



Figure 14. CRA 3: Overview of the abandoned railroad grade and proposed project area, looking southeast.



Figure 15. CRA 3: Overview of the culvert's interior showing limestone block floor, looking east.

Based on information reviewed online, the railroad grade and culvert at CRA 3 were likely built between 1868 and 1875 as part of increased railroad construction following the end of the Civil War. With \$400,000 in bonds issued for the construction of a railroad in Muhlenberg County, construction got underway in March 1869 on what was known as the Elizabethtown & Paducah Railroad. However, following the bankruptcy of the railroad's parent company in the 1870s, panic over the value of the railroad bonds engulfed the people of Muhlenberg County. Legal battles over the bond payments played out at both the local and national level through the first decade of the twentieth-century. With significant railroad debt stifling the county's economic growth, the valuation of the county's lands plummeted. However, after the eventual settlement of the railroad bond issue between 1906 and 1910, growth once again returned to Muhlenberg County (Robert 1913).

While evaluation of the entire line of the abandoned railroad is beyond the scope of the current overview survey, the stone culvert and railroad grade at CRA 3 is considered potentially significant for its association with the Elizabethtown & Paducah Railroad and later the Louisville and Nashville Railroad. The culvert is also potentially significant as an excellent example of a stone railroad culvert.

In addition to evaluating individual resources, CRA also considered the potential for historic districts in the study area. CRA did not identify any significant concentrations of thematically or architecturally related resources. Recent residential and commercial development is found throughout the study area along US 431, and there is ample evidence of other changes that have occurred over the years to update properties for continued use both within and adjacent to the study area. Many of the older resources observed during the survey no longer retain integrity, as they exhibit replacement materials and/or incompatible additions. Additionally, the loss of resources 50 years of age or older and the resulting infill diminish the architectural cohesiveness of the area. Therefore, CRA recommends that the area within and adjacent to the study area does not demonstrate sufficient integrity or contain a significant concentration of thematically or

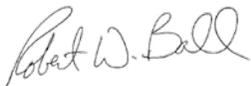
architecturally related resources to warrant listing in the NRHP as a historic district under Criterion A, B, or C.

The locations of the potentially significant resources are mapped in the above topographic quadrangles and aerial photographs and are included with the accompanying electronic shapefiles. Initial recommendations for potential NRHP eligibility for the surveyed resources in the study area are included in Table 1.

In summary, three previously unrecorded resources (CRA 1–3) were identified during the overview survey with an initial recommendation that they do not appear to be eligible for inclusion in the NRHP under Criterion A, B, or C.

Additional resources 45 years of age and older are located in the study area, but those viewed from the ROW by CRA personnel do not appear to have significance and/or integrity for potential listing in the NRHP. Additionally, further investigation will be required to ascertain whether CRA 1–3 are eligible for listing the NRHP. If you have any questions, please do not hesitate to contact me.

Sincerely,



Robert Ball, MHP
Architectural Historian, Principal Investigator

References Cited

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1950 Highway and Transportation Map of Muhlenberg County, Kentucky. Frankfort, Kentucky.
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1953 Dunmor, Kentucky, 7.5-minute series topographical quadrangle. United States Department of the Interior, Washington, DC.