



Date: October 20, 2026

To: WisDOT Consultant Unit Supervisors

From: Anna Wisner, Statewide Consultant Engineer

Subject: Chronicle Heritage Closure

Guidance for some common scenarios related to the Chronicle Heritage closure:

1. Completed Section 106 submitted was sent to the WisDOT Cultural Resources Unit (CRT) for review:
 - o CRT is handling case by case and will reach out to the project team if there is an outstanding issue to resolve
2. Project team has completed reports from Chronicle Heritage but has not submitted them to CRT
 - a. Project team should submit the completed Section 106 submittal as soon as possible to CRT
 - b. CRT will handle on case by case and will reach out to the project team if there is an outstanding issue
3. Scope of services not completed by Chronicle Heritage
 - a. Prime consultant will need to hire a new cultural resource service provider
 - i. Note, if the consultant received previous data/documentation or incomplete work, share with new sub-consultant to help facilitate completion
 - b. This applies to field surveys, consultation, MOA's, mitigation, or other aspects of the Section 106 process
 - c. If the project has a scope change and requires a section 106 amendment, a new service provider will be needed
4. Please work with your Region Project Manager on contract modifications. Prime consultants must obtain approval to sublet any part of the contract. An amendment will be needed for the prime consultant to add the new subconsultant.
 - a. Costs incurred or services provided without authorization - including subconsultants - cannot be included in a contract or reimbursed.
 - b. Subconsultant selection - Subconsultants may be selected using QBS as outlined in FDM 8-5-1 or using cost proposals from a minimum of two qualified firms.
 - c. Estimate - Subconsultants that are lump sum, unit cost, or specific rate of compensation and less than \$75,000 may use market rates. The estimate must still be detailed and costs reasonable for the services provided.
 - d. Please work with Masterworks Support to include a reduction in the unused portion of Chronicle Heritage's subcontract. Masterworks support can be located at:
WisDOTmasterworks@dot.wi.gov
5. For questions regarding the subconsultant contract
 - a. It is the prime consultant's responsibility to determine their business service contract with the subconsultant (e.g. 1099 contract) and that the contract contains all the necessary flow-down requirements. Prime consultants retain full responsibility for the fulfillment of the contract.
 - b. A list of qualified professionals can be found on the WHS Website:
<https://www.wisconsinhistory.org/preserve/state-historic-preservation-office/historic->

[preservation-archaeological-consultants/](#). This list is not inclusive of all cultural resource providers who can conduct work in WI.

- c. For new consultants, it is the consultant's responsibility to determine how to organize their own business (legal and tax identity).
 - i. Consultants in our contracts could be:
 - Sole proprietorship (individual)
 - Single-member (individual) or multi-member limited liability corporation
 - Partnership
 - C Corporation
 - S Corporation
 - Non-profit
 - Government
 - Other

For project specific Section 106 questions or scenarios, please reach out directly to the WisDOT Cultural Resources unit:

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