



#E1-21140
w/out maps

TRIBAL HISTORIC PRESERVATION OFFICE

Date: October 5, 2015

File: 1415-1656MO-4

RE: Missouri Central Railroad Company Right of Way in Benton, Cole, Cass Franklin, Gasconade, Maries, Miller, Morgan, Osage, and Pettis Counties, MO

Office of Environmental Analysis, Surface Transportation Board
Diana Wood
395 F Street SW, Room 1110
Washington D.C. 20243

Dear Ms. Wood,

The Osage Nation Historic Preservation Office has received notification and accompanying information for the proposed project listed Missouri Central Railroad Company Right of Way in Benton, Cole, Cass Franklin, Gasconade, Maries, Miller, Morgan, Osage, and Pettis Counties, MO. The entirety of this project lies within the heart of Osage ancestral homelands. So much so, that many modern features such as Osage County and the Osage River are named after the Osage Nation. Therefore, there are several locations with a high probability of containing Osage sites, camps, burials, trails, and other significant cultural resources along the projected APE for this project. **The Osage Nation requests that a cultural resources survey including shovel testing be conducted for this project in order to avoid adversely effecting potential Osage cultural resources in the APE. Our office has reviewed the APE, and is attaching six maps with the areas we consider to have the highest probability of encountering Osage cultural resources highlighted. We request that shovel testing be conducted in these areas.** When the railroad was initially constructed from 1901-1905, it is highly likely that sites affiliated with the Osage were impacted at that time. Our request for shovel testing is to ensure that those sites will be identified, and will not be further impacted through future construction.

In accordance with the National Historic Preservation Act, (NHPA) [16 U.S.C. 470 §§ 470-470w-6] 1966, undertakings subject to the review process are referred in S101 (d)(6)(A), which clarifies that historic properties may have religious and cultural significance to Indian tribes. Additionally, Section 106 of NHPA requires Federal agencies to consider the effects of their actions on historic properties (36 CFR Part 800) as does the National Environmental Policy Act (43 U.S.C. 4321 and 4331-35 and 40 CFR 1501.7(a) of 1969).

The Osage Nation has a vital interest in protecting its historic and ancestral cultural resources. Should you have any questions or need any additional information, please feel free to contact me at the number listed below. Thank you for consulting with the Osage Nation on this matter.


Andrea A. Hunter, Ph.D.
Director, Tribal Historic Preservation Officer


Jackie Rodgers, BPA
Archaeologist