

Appendix 3.8C
Tribal DEIS Comments



TRIBAL HISTORIC PRESERVATION OFFICE

Date: December 11, 2015

File: 1516-664MO-10

RE: USACE, National Geospatial-Intelligence Agency building, St. Louis, MO, and St. Clair County, IL

USACE, St. Louis District
Roberta Hayworth
1222 Spruce Street
St. Louis, MO 63103-2833

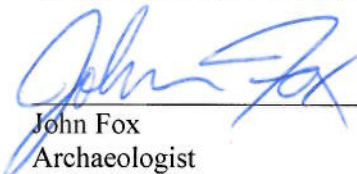
Dear Ms. Hayworth,

The Osage Nation Historic Preservation Office has received and reviewed the draft EIS for the new National Geospatial-Intelligence Agency building in the St. Louis area. We apologize for our late response.

We have two major issues with the draft EIS. First, on page 3-86, lines 31-32 state, "To date, the tribes historically affiliated with the areas have not identified any tribal cultural resources in or near the alternative APEs." This statement is not accurate. On January 22, 2015, our office sent you an email that said, "The North St. Louis City Site is near the Osage Mississippi River Trail." On August 11, 2015, our office sent another email that said, "We would also like to emphasize that the North St. Louis location has the highest likelihood to encounter ancestral Osage sites, as it is near the Osage Mississippi River Trail and the Mississippi River itself." **The Mississippi River Trail is a tribal cultural resource in or near the North St. Louis APE.**

Second, the EIS states that the Fenton and Mehlville sites will have no/negligible impacts to cultural resources. However, the cultural resource survey reports from May recommended trenching at the Fenton site and a Phase 1 survey for the Mehlville site. **We concur with the recommendations of the reports, not the EIS for these sites.** We do concur that the North St. Louis site and St. Clair County site would cause major, negative, long-term impacts to cultural resources at these sites.

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.



John Fox
Archaeologist

Koenig, Chris J MVS

From: John Fox <jfox@osagenation-nsn.gov>
Sent: Tuesday, January 05, 2016 3:00 PM
To: Hayworth, Roberta L MVS
Cc: Andrea Hunter; Koenig, Chris J MVS
Subject: [EXTERNAL] FW: National Geospatial-Intelligence Agency Campus

Here is the email I sent to you on January 22. The other will be sent shortly.



John Fox

Archaeologist

627 Grandview Avenue, Pawhuska, OK 74056

Phone: 918-287-5274

jfox@osagenation-nsn.gov

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From: John Fox
Sent: Thursday, January 22, 2015 1:18 PM
To: 'roberta.l.hayworth@usace.army.mil'
Cc: Andrea Hunter
Subject: National Geospatial-Intelligence Agency Campus

Dear Ms. Hayworth,

The Osage Nation Historic Preservation Office has received a notification regarding the new National Geospatial-Intelligence Agency campus in the St. Louis region. All four of the proposed locations are highly sensitive areas for the Osage Nation, and we would like to participate in tribal consultation with you on this project. We would request cultural resource surveys for any of these locations. The North St. Louis City Site is near the Osage Mississippi River Trail, and is likely the most sensitive location for the Osage Nation. Additionally, this location incorporates the former Pruitt-Igoe site. This is not a direct concern for the Osage Nation, but it is likely an important recent historical archaeological site, especially for the African American community in the St. Louis area.

Thank you for consulting with the Osage Nation,

John Fox
Archaeologist I
Osage Nation Historic Preservation Office
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Pawhuska, OK 74056
(918)287-5274
jfox@osagenation-nsn.gov

Koenig, Chris J MVS

From: John Fox <jfox@osagenation-nsn.gov>
Sent: Tuesday, January 05, 2016 3:00 PM
To: Hayworth, Roberta L MVS
Cc: Andrea Hunter; Koenig, Chris J MVS
Subject: [EXTERNAL] FW: NGA West Cultural Resource Surveys

John Fox
Archaeologist

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From: John Fox
Sent: Tuesday, August 11, 2015 9:13 AM
To: 'Hayworth, Roberta L MVS'
Cc: Andrea Hunter
Subject: NGA West Cultural Resource Surveys

Dear Ms. Hayworth,

The Osage Nation Historic Preservation Office has received and reviewed the Cultural Resource Survey reports for the Next NGA West Project that you provided. We concur with the recommendations Brockington provided for each location (trenching in Fenton, Phase 1 for Mehlville, Phase 1 for North St. Louis, and avoidance of 11S825 in St. Clair County). We would also like to emphasize that the North St. Louis location has the highest likelihood to encounter ancestral Osage sites, as it is near the Osage Mississippi River Trail and the Mississippi River itself. This is in an area with high probability for Late Woodland through Mississippian period sites, including sacred sites, such as mound and burial locations. Therefore, the Osage Nation requests that the North St. Louis site be avoided.

Also, I apologize for not getting back to you about the Desloge Bank Stabilization project. The last month has been extremely busy here. We have no concern for the project, that I believe has already been permitted, and I will send our letter today. Thank you for providing all of the information to help make that decision.

Thank you for consulting with the Osage Nation,

John Fox

Archaeologist

Osage Nation Historic Preservation Office

627 Grandview

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