

From: [Tabachnick, Alan](#)
To: [Assenza, Adam](#)
Cc: [Bartlett, Alex](#); [Wolff, Mikenna](#); [Wheaton, Jenna](#); [Crawford, Karen](#)
Subject: Osage Nation Comments on Draft Archaeo SOW
Date: Wednesday, October 13, 2021 8:32:47 AM
Attachments: [CRA Proposal ICF-Port KC Project final Redacted ONHPO comments.pdf](#)
Importance: High

Here are the comments from the Osage Nation on CRA's proposed SOW. Minor comments that can be incorporated into a final version. I agree with all of their comments, none of which would entail changes in the approach. I will reach out to the SHPO to see if they will have any comments. The due date is the 20th. Thanks.

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From: Deseray Helton <deseray.helton@osagenation-nsn.gov>
Sent: Wednesday, October 13, 2021 10:18 AM
To: Tabachnick, Alan <alan.tabachnick@stb.gov>
Cc: Andrea Hunter <ahunter@osagenation-nsn.gov>; Sarah O'Donnell <sodonnell@osagenation-nsn.gov>; Jess Hendrix <Jess.Hendrix@osagenation-nsn.gov>
Subject: RE: Port KC MRT Rail Project (FD 36406) - Archaeological Survey Scope of Work
Importance: High

Good Morning Mr. Tabachnick,

Attached please find the Osage Nation's comments in regards to the archaeological scope of work for the proposed Port of KC Rail Project, located in Kansas City, Missouri.

Thank you,

Deseray Helton

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From: Tabachnick, Alan <alan.tabachnick@stb.gov>
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Subject: Port KC MRT Rail Project (FD 36406) - Archaeological Survey Scope of Work

Attached please find the archaeological scope of work for the proposed Port KC MRT Rail Project, located in Kansas City, Missouri. It was developed in accordance with appropriate state and federal guidelines. Please review this document and let us know any comments or concerns that you may have. It is anticipated that work in the field could start in the last quarter of 2021 so please provide any comments to me prior to October 20th.

If you would like to discuss any of the items in the SOW, let me know and we can set up a meeting. Looking forward to continuing consultation on this important project with everyone.

Thanks very much.

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Submitted to:

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At the request of ICF, CRA is providing a scope of work (SOW) and cost estimate to complete an archaeological survey for a proposed Port Authority of Kansas City (Port KC) project. The Port KC intends to file for approval from the Surface Transportation Board (STB) to develop approximately 456 acres along the Missouri River near downtown Kansas City, in Jackson County, Missouri. The project will require compliance with Section 106 of the National Historic Preservation Act, and the Missouri State Historic Preservation Office (SHPO) and the Osage Nation have provided input regarding the need for an archaeological survey for the project.

Area of Potential Effects (APE)

The APE for archaeology **for the** will include all areas of potential ground disturbance associated with the project, which includes approximately 456 acres of currently grassy and wooded lots. About 230 acres of previously disturbed land (areas of concern [AOC] and solid waste management units [SWMU]) associated with prior industry, and which is subject to a “no dig” stipulation, is included within this APE.

Scope of Work

The APE will be investigated according to archaeological survey and reporting guidelines published by the Missouri SHPO¹ and the Osage Nation². The scope of work includes a records review, a field survey of the APE, and **a report** of the investigation. All aspects of the project, including direct supervision of the fieldwork, will be managed by an archaeologist who meets the Secretary of the Interior’s Professional Qualification Standards for Archaeology (36 FR Part 61: 48 FR 44716).

Records Review

According to the guidelines, an archaeological records review will be conducted to identify archaeological sites within the project area and a 1.0-mile buffer (search radius) of the project area, using the following sources:

- The online Missouri Department of Natural Resources Archaeology Viewer maintained by the State Historic Preservation Office (SHPO) will be used to identify previously recorded archaeological sites, historic structures, and historic districts within the APE and search radius. Previously conducted cultural resource surveys within and adjacent to the APE will also be identified.
 - A preliminary review of the Missouri Archaeology Viewer shows at least eight previous archaeological investigations and two previously recorded archaeological site within or adjacent to the APE. Two of the prior archaeological studies are only records reviews (no fieldwork was associated

¹ Missouri SHPO, *Guidelines for Phase I Archaeological Surveys and Reports*. Accessed August 2021, https://mostateparks.com/sites/mostateparks/files/MO_phase1_guide.pdf

² Osage Nation Historic Preservation Office, *Archaeological Survey Standards*, revised December 2018. Accessed August 2021, https://s3.amazonaws.com/osagenation-nsn.gov/files/departments/Historic-Preservation/2019-0407_Historic-Preservation_ONHPO-Survey-Standards.pdf

with the reports) and five are previous archaeological surveys that pre-date 2000. The other field investigation is an archaeological survey from 2005, for a proposed highway corridor alternative. Since little information about the archaeological reports is available in the online viewer, as part of the records review scans of the reports will be requested from SHPO or the actual reports will be reviewed at the SHPO office.

- Historic and current maps and aerial photography available online will be researched to identified potential cultural resources within the APE and search radius.
- The online listing of National Register of Historic Places (NRHP) properties will be researched to identify any such properties within the APE and search radius.
- USDA soils survey reports and maps, as well as other available and relevant geological maps and sources, will be examined to provide a preliminary assessment of the potential for deeply buried archaeological deposits within the APE. Furthermore, a qualified professional geoarchaeologist, Rolfe Mandel, will be consulted to develop a model of the potential for deeply buried archaeological deposits to be in the APE.
 - A preliminary review of historic maps, as well as soils and geological data for the APE, indicate that it is within a relatively recent floodplain is not likely to contain archaeological deposits more than 200 years old.

Phase I Archaeological Survey

An archaeological survey will be conducted by a team of up to five archaeologists, all with experience in the Midwest. The purpose of the survey is to identify archaeological sites in the project area and to provide an initial assessment of their National Register of Historic Places (NRHP) eligibility. Prior to the survey, it is assumed that the Osage Nation will be contacted by the STB through government-to-government consultation to discuss the exclusion of disturbed “no dig” areas from any archaeological excavation. Further assuming that the Osage Nation agrees with this methodology, all disturbed areas within the APE will only be visual examined to confirm disturbance and that no archaeological sites are present on the ground surface within these areas. A hazardous materials response protocol will also be developed in the event hazardous materials are encountered during fieldwork .

Also, assuming much of the undisturbed APE (approximately 226 acres) has less than 25 percent ground surface visibility, shovel testing on a 15 m interval will be conducted according to the guidelines. Specifically, shovel tests will be excavated no less than 30 cm in diameter and at least 20 cm below archaeologically sterile soil (usually within 40 to 50 cm below the ground surface [bgs]), and excavated sediment from each shovel test will be screened through 0.25 inch hardware mesh. In accordance with Osage Nation Guidelines, a shovel test log will be kept that includes Global Positioning System (GPS) coordinates, soil stratigraphy (depth, color, texture of each horizon), and the presence of absence of artifacts. Each shovel probe location will also be labeled and recorded using the GPS for production of a detailed map.

A majority of the undisturbed APE is also within alluvial soils that may have the potential for deeply buried archaeological deposits. Therefore, in consultation with the project geoarchaeologist, limited hand excavated auger probes may be conducted on representative alluvial landforms within the APE to assess the potential for deeply buried archaeological deposits deeper than 50 cm bgs. If determined to be necessary, and after approval by the SHPO and the Osage Nation (through coordination with STB), these auger probes would be excavated and recorded in a similar manner as shovel probes.

When an archaeological site is encountered, standard field recording methodologies will be employed according to the guidelines. Specifically, when artifacts are found in a shovel probe, and to define site boundary, the shovel probing will continue on 15 m intervals across the site until a negative probe is encountered. Then, the shovel probing interval will be reduced to 5 m until two negative shovel probes are identified. The locations of archaeological sites found in the APE, as well as collection units (shovel probes and/or surface collection cells) within the site areas, will be recorded using a GPS receiver. Any artifacts recovered during the survey will be returned to the CRA laboratory in Evansville, IN for cleaning, analysis, and cataloging following standard practices. At the conclusion of the project, landowners will be offered the artifacts back. If artifacts are not accepted by landowners, an in-state university or museum will be used as the curation facility.

Report Production/Deliverables

For reporting the results of the archaeological survey, CRA will prepare a full report and Section 106 Survey memo according to SHPO and Osage Nation guidelines. The report and Survey Memo will contain all relevant details of the project, including results of the records review research, survey results, and, if needed, detailed description of each archaeological site identified, NRHP eligibility assessment of each site, and any additional site-specific recommendations. Maps showing the archaeological survey methods and results, as well as individual archaeological site maps, will be produced and included in the report.

An electronic copy of the report and memo will be submitted to the client for review. CRA will make any required changes and, if requested, CRA will submit no more than 2 hard copies of the final report and memo to the client for distribution to agencies.

Schedule

CRA can complete the records review, fieldwork, and reporting according to the following schedule:

- Records review can be completed within 15 days of notice to proceed (NTP).
- Fieldwork should take a crew of 5 archaeologists no more than 5 weeks to complete and can begin no later than October 18th assuming NTP is provided by September 27th.
- An email summary of the fieldwork results will be reported to the client within 2 days after fieldwork completion.
- And, if requested, a short management summary document demonstrating fieldwork completion and preliminary results can be produced within 10 to 15 days following the fieldwork.
- The full report of the investigation will be submitted within 45 to 60 days following the completion of fieldwork. Report completion time will vary depending upon the results of the fieldwork.

Cost Proposal

The records review, fieldwork, and reporting for the project can be completed on a time and materials basis not to exceed [REDACTED], **including up to 20 auger probes and the recording, analysis, and reporting for the 2 previously recorded archaeological sites within/adjacent to the project area.** No more than 3 additional archaeological sites (5 total) are anticipated within the APE. If more than 5 archaeological sites are identified and recorded, a supplemental may be required depending on the additional effort required for archaeological site recording. A supplemental may also be needed if more than 20 auger probes, or other forms of deep testing are required for the project.

Project Assumptions

- Any previous archaeological surveys conducted within the APE prior to 2000 likely did not follow the current SHPO and Osage guidelines and would need to be resurveyed using current methods.
- CRA will not be consulting directly with the Osage Nation or any other tribes. The STB will coordinate with the Osage Nation through government-to-government consultation.
- No more than 456 acres will need to be surveyed for the project, of which only 226 acres will require shovel probing. And, no more than 20 hand-excavated auger probes will be excavated in the APE.
- The archaeological survey of the project area will take a crew of 5 archaeologists approximately 20 to 30 days to complete, including 4 round trips from Evansville, IN.
- Systematic deep archaeological testing, phase 2 NRHP evaluations, or phase 3 archaeological mitigation is not considered a component of this proposal. Similarly, the preparation of site testing plans, mitigation plans, data recovery plans, etc. are beyond the scope of this proposal.
- In-person meetings with clients, agencies, tribes or others are beyond the scope of this proposal.
- Client will provide electronic mapping and any necessary information in a timely fashion.
- Any alterations to the Project area submitted to CRA after the completion of the above tasks are beyond the scope of this proposal.
- There will be no significant delays to fieldwork schedule due to weather, landowner permission, or client delays.
- A site-specific safety plan to address potential hazardous material exposure will be developed in consultation with the STB, Port KC, and ICF.
- In consultation with ICF, CRA will further develop a hazardous materials response protocol for inclusion in a field methodology, which will be reviewed and approved by STB, SHPO and the Osage Nation before CRA commences field activities.
- Pre-fieldwork safety training will be conducted so field staff are aware of potential hazardous materials on the property, and to clearly specific areas to be avoided/excluded from the survey and to ensure the entire crew is aware of the hazardous materials response protocol.
- CRA's proposed field activities will not trigger the need for 40-Hour HAZWOPER training associated with known areas of contamination within the APE.
 - Intrusive survey efforts will not occur within no dig areas, including SWMUs 1, 2, and 5
 - Additionally, disturbance will be avoided within SWMU 4, SWMU 12, and AOC 8 due to elevated lead in surface soils.

Signed: 

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