



Region 3 State Parks
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**Environmental Assessment Decision Notice
Madison Buffalo Jump Trails Project
May 5, 2021**

Description of Proposed Action: Montana Fish, Wildlife & Parks (FWP), State Parks Division proposes to rehabilitate numerous social trails and re-route sections of steep trail at Madison Buffalo Jump State Park. The project would improve visitor safety and decrease erosion through restoration of impacted areas using native vegetation and directing trail users to a more defined, sustainable trail system. This proposed action would meet the primary objective of providing reasonable access to the public while protecting one of our state's valuable cultural and natural resources. The project is under review for funding from a Montana Trails Stewardship Grant in collaboration with a Montana Conservation Corps work agreement.

Public Process and Comments: FWP is required by the Montana Environmental Policy Act (MEPA) to assess potential impacts of a proposed action to the human and physical environment. In compliance with MEPA, an Environmental Assessment (EA) was completed for the proposed project by FWP and released to the public for review via a 30-day comment period that ran from March 8, 2021 through April 8, 2021. The public was informed of this notice via the following:

- Two legal notices each in Bozeman *Daily Chronicle* and Helena *Independent Record*
- Copies of the EA mailed, or notification of its availability emailed to neighboring landowners
- Public notice posted on the Fish, Wildlife & Parks web page: <http://fwp.mt.gov>
- Copies of the EA available at FWP Region 3 Headquarters; or by emailing mark.filonczuk@mt.gov

Summary of Public Comments: A total of eighteen comments were received via email during the comment period, the majority of which were supportive for the proposed action (Alternative B) as it provides improved access to a sensitive cultural area, prevents further damage from erosion, and restores biodiversity within the park. They also cited the noticeable increase in use causing damage to the resource and the need to consolidate/define the trails system better for ease of visitor use. The restoration plans for impacted areas would align with the goals of resource protection for the park. Commenters did have some concerns and suggestions which are outlined below.

Issues Raised during the Public Comment Period: Two comments were received in opposition to the proposed project; One comment opposed any digging at the park due to possible impacts to cultural sites. The other comment opposed closing any of the social trails due to concern over congested traffic on the main trails due to the increase in visitor use. All other comments were favorable to Alternative B, but with the following considerations;

- Open heritage review in progress for public comments and have tribal consultation as part of the process.
- Keeping most of the trail open in proposed trail Revegetation Area #3 in order to limit congestion on the rim trail.
- Chance of disturbing both cultural and wildlife sites within the proposed trail reroute areas.
- Maintain Madison Buffalo Jump as a primitive park.

- Addition of interpretive signage to educate visitors not to disturb cultural resources.
- Revegetation of Jump Base Trail (part of Revegetation area #2) would fail due to public desire to keep going there; reroute with sustainable grade instead.
- In addition to the proposed work, adding a reroute/revegetation section on the south trail where it leaves the rim and is eroded.

FWP Response to Comments:

The proposed project is within the scope of work that the department can accomplish to address resource issues at Madison Buffalo Jump State Park, pending both the completion of a Heritage Resource Review and approval of grant funding.

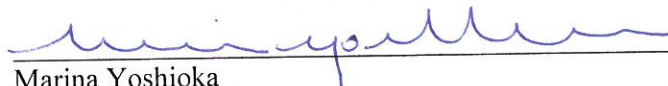
In accordance with the Montana Antiquities Act (22-3-421 to 22-3-442) and with FWP's ARM rules (12.8.501 to 12.8.10), a heritage resource review was conducted by MT State Parks Heritage Resources Program Manager, Rachel Reckin. A compliance letter will be submitted to the State Historic Preservation Office (SHPO) detailing her findings and requesting concurrence. If sites are identified and cannot be avoided, in accordance with MCA 22-3-430, mitigation measures will be devised in consultation with SHPO. Tribal consultation is also part of the ongoing heritage resource review process.

Construction of new trail could possibly uncover cultural artifacts or sites of historical significance unknown before. This would be mitigated by having a cultural resource monitor in place during this phase of work and changing the layout of the trail if needed.

Upon consideration of suggestions proposed in the comments, MT FWP provides the following information:

- Monitoring of all trails for future degradation and impacts will be conducted on an ongoing basis.
- Use low impact signage and material to educate the public about the revegetation areas and divert foot traffic in order to reclaim the native landscape.
- There is no plan to delist Madison Buffalo Jump State Park from the Primitive Parks Act. The Primitive Parks Act allows for the maintenance of current park infrastructure; however, providing additional interpretive signage along the trails is prohibited by state statute.
- Section B in the EA (Human Environment, #8 Cultural and Historic Resources) will be amended to only "unknown" impacts; all work at the site will be surveyed and monitored by resource managers and mitigated as necessary.

Decision: Based on the Environmental Assessment and public comment, it is my decision to chose Alternative B, modified to keep part of the trail open in Revegetation Area #3 and monitor for further impacts. This action will improve visitor safety, park aesthetics and preserve cultural resources by eliminating steep grade, restoring native vegetation and defining a more efficient trail system.



Marina Yoshioka
Region 3 Supervisor
Montana Fish, Wildlife and Parks

5/6/21

Date